

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VIRTUAL CREATIVE ARTISTS, LLC,

Plaintiff,

v.

NEXTDOOR, INC.,

Defendant.

C.A. No. 1:23-cv-0XXXX

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Virtual Creative Artists, LLC files this Original Complaint for Patent Infringement against Nextdoor, Inc. and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Virtual Creative Artists, LLC (“VCA” or “Plaintiff”) is a Delaware limited liability company, having business address at 338 Gracious Way, Henderson, NV 89011.

2. On information and belief, Defendant Nextdoor, Inc. (“Nextdoor” or “Defendant”) is a corporation organized and existing under the laws of Delaware. Defendant has a registered agent at Paracorp Incorporated 2140 S Dupont Hwy, Camden, DE 19934

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged herein in.

Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware corporation.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware. Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is a corporation organized in Delaware and therefore resides only in Delaware. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this District under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,501,480)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On November 22, 2016, United States Patent No. 9,501,480 ("the '480 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '480 Patent is

titled “Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same.” A true and correct copy of the ‘480 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. VCA is the assignee of all right, title, and interest in the ‘480 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘480 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the ‘480 Patent by Defendant.

11. The invention relates to the field of creating and distributing media content, in particular, creating media content based upon submissions received on an electronic media exchange. At the time of the original invention in 1998, there was an Internet-centric problem that required a technical solution—how to develop a computer system that would allow remote contributors of electronic content to share and collaborate their content to develop new media content. The claimed invention, which predates modern crowdsourcing solutions, offers a unique, unconventional, and specially configured combination of “subsystems” in which to address the Internet-centric problem.

12. As set forth in the claims, the claimed invention has a collection of unconventional and particularly configured subsystems, including:

- “an electronic media submissions server subsystem,”
- “an electronic multimedia creator server subsystem,”
- “an electronic release subsystem,”
- “an electronic voting subsystem,” and
- their corresponding specialized databases.

13. Each of these subsystems are configured in a very specific (and not generic), unconventional and non-routine manner to offer the novel and non-obvious claimed invention.

For example, claim 1 requires an “electronic media submissions database,” which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databases required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

14. As another example, the claim requires a specifically configured “electronic media submission server subsystem.” This subsystem is defined as specifically having:

- “one or more data processing apparatus,”
- “an electronic media submission database stored on a non-transitory medium,”
and
- “a submissions electronic interface.”

The “submissions electronic interface” is further specifically “configured” [1] “to receive electronic media submissions from a plurality of submitters over a public network, and [2] store the electronic media submissions in the electronic media submission database.” Further, “the electronic media submissions database” in this subsystem is further required to “store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission.” Collectively, the level of detail included in this very particular, well-defined, and unconventional subsystem makes clear that the claims include substantially more than the alleged abstract idea or merely performing an alleged abstract idea on a computer.

15. Similarly, the claim also requires a separate specifically configured “an electronic multimedia creator server subsystem.” The claim specifically defines how this second subsystem

interacts with other components including being “operatively coupled to the electronic media submissions server subsystem.” The claim also specifically defines this subsystem as “having”:

- “one or more data processing apparatus” and
- “an electronic creator multimedia database stored on a non-transitory medium.”

16. This subsystem is also specifically “configured [1] to select and [2] retrieve a plurality of electronic media submissions from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server.” The “filter” also includes a very specific algorithm of “being based at least in part on at least one of the one or more user attributes to develop multimedia content to be electronically available for viewing on user devices.” Even more detail is provided by requiring “the identification of the submitter [be] maintained with each selected and retrieved submission within the multimedia content.” Here again, collectively, the level of detail included in this very particular and well-defined and unconventional subsystem makes clear that the claims include substantially more than an alleged abstract idea or merely performing an alleged abstract idea on a computer.

17. The claim also includes “an electronic release subsystem,” which is well defined and not conventional or routine. The claim defines how this subsystem is “operatively coupled to the electronic multimedia creator server subsystem.” The claim also defines the components of this subsystem as having “one or more data processing apparatus” and being particularly “configured to make the multimedia content electronically available for viewing on one of more user devices.” These details, collectively, also make this very particular and well-defined and unconventional subsystem substantially more than an abstract idea or performing an abstract idea on a computer.

18. The claim also requires “an electronic voting subsystem,” which is well-defined, specific, and unconventional. This claimed subsystem has “one or more data processing apparatus” and is specifically “configured to enable a user to electronic vote for or electronically rate an electronically available multimedia content or an electronic media submission within a respective electronically available multimedia content.”

19. Claim 1 is a specific and discrete implementation. For example, the claim requires an “electronic content filter” located at the server, remote from end users, and customizable based on user attributes. As another example, the “electronic voting subsystem” at the time of the invention was novel and inventive and added sufficient inventive contributions to avoid a risk of preempting creating and distributing media content. It is possible to create and distribute media content without ever having to include a “voting” subsystem on what components should be included in such media content. The detailed configuration “to enable a user to vote for or electronically rate an electronically available multimedia content or an electronic media submission within a respective electronically available multimedia content” has the level of particularity that avoids any risk of preemption.

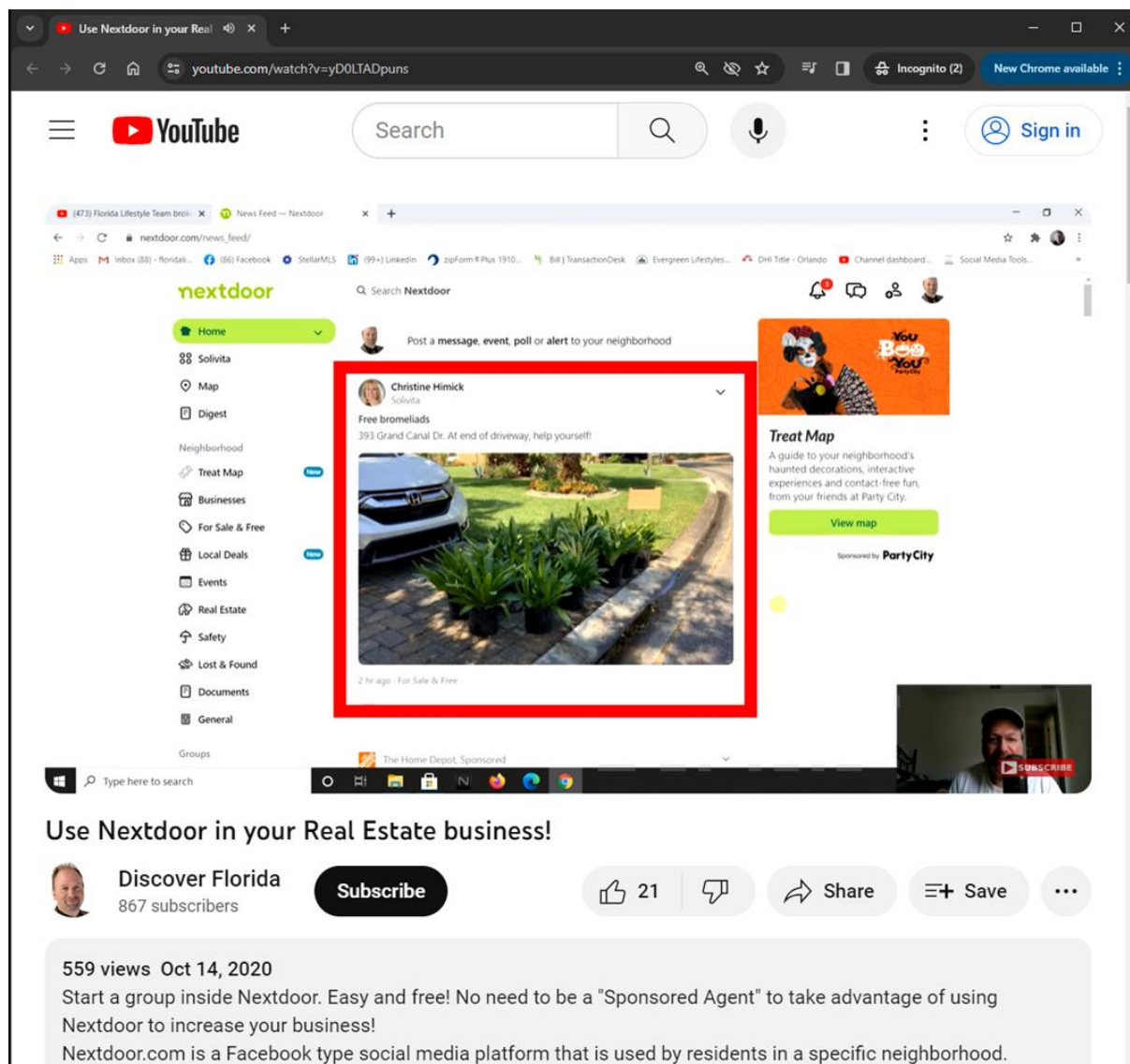
20. Furthermore, the very particular and specifically configured “electronic media creator subsystem” not only provides a detailed and unique physical structure and interrelationship with other claimed components, but also includes a very specific configuration that is not conventional or routine. The claims make clear the interrelationship of the “electronic multimedia creator server subsystem” with respect to “the electronic media submission server subsystem” which must be “operatively coupled” thereto. The claims also provide detail on how the “electronic media creator subsystem” is “configured” “to select and retrieve a plurality of electronic media submissions from the electronic media submission database using an electronic

filter.” They also provide detail on how the “electronic filter” is “based at least in part on at least one of the one or more user attributes” and specifies that “the identification of the submitter is maintained with each selected and retrieved submission within the multimedia content.”

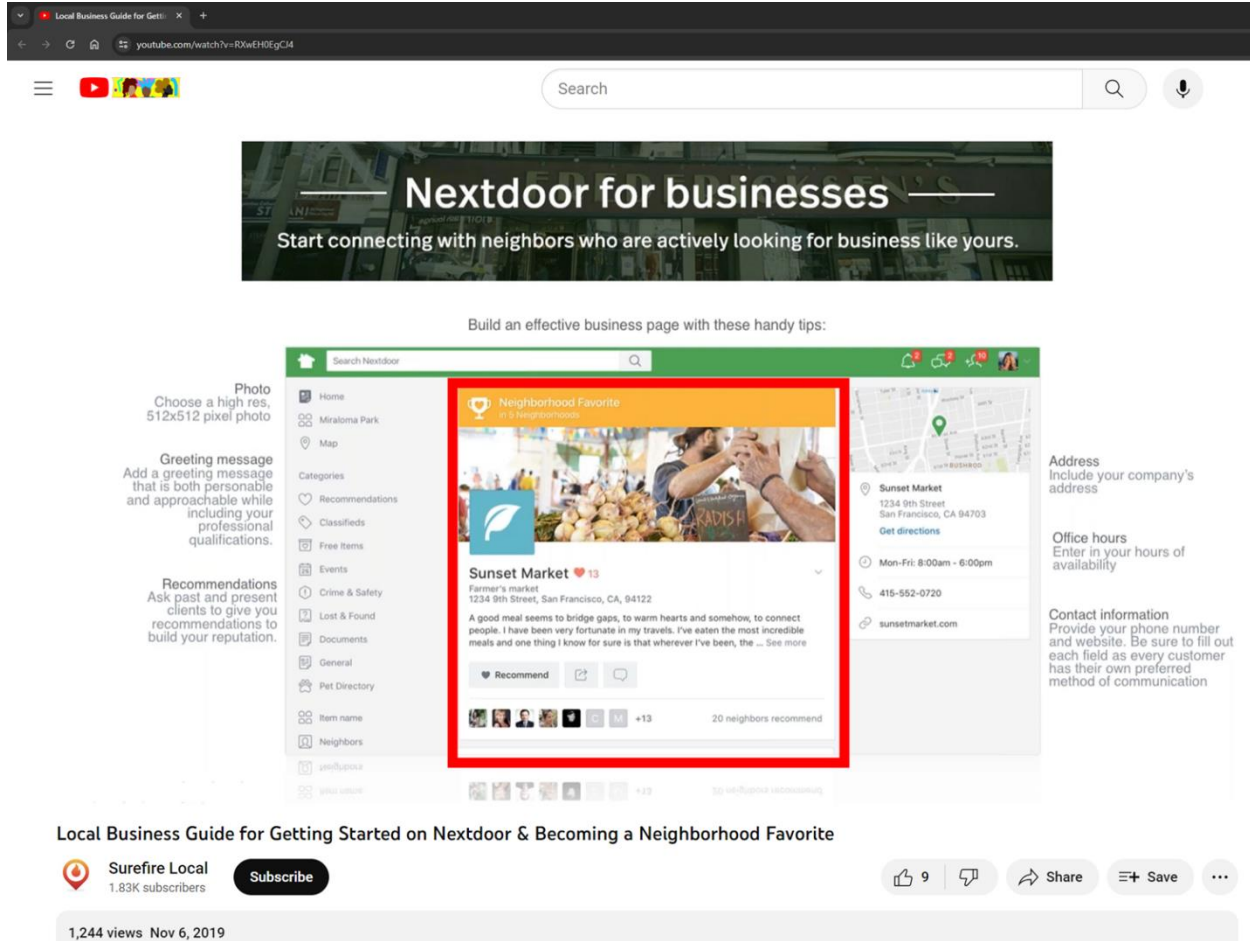
21. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the ‘480 patent before the United States Patents and Trademark Office.

22. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the ‘480 Patent in Delaware, and elsewhere in the United States, by employing a computer-based system using <https://nextdoor.com/> (“Accused Instrumentality”) (e.g., <https://nextdoor.com/>). Nextdoor uses a computer-based system for its Accused Instrumentality to enable user-submitters to create personalized user profiles and browse the profiles of other users based, *inter alia*, on the user-submitter’s location and neighborhood. User-submitters may create an account and user profile, and link the profile to online neighborhood groups. User-submitters may create multimedia content as a public post which may appear on a live feed of other users within the user-submitter’s “neighborhood” corresponding to the user-submitter’s location, and other users in the neighborhood or group may interact with the public post. The profiles include multimedia content including image and textual content (e.g., a submitter’s profile picture and an About Me section) which may be shown to other users based on, *inter alia*, user-selected preferences and attributes, and by the user-submitter’s location and neighborhood. Users may also submit multimedia content such as job listings, business listings, and real estate listings as a public post which may appear on a live feed of other users. User-submitters may also create business profiles and promote business services as posts containing multimedia content on neighborhood groups. Nextdoor, during the relevant time period, took

advantage of multiple cloud server providers for Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. Nextdoor uses and has used during the relevant time period numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.



(E.g., <https://www.youtube.com/watch?v=yD0LTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

The screenshot shows a web browser window with the address bar displaying "youtube.com/watch?v=TTNeOfSoSVU". The page content is a Nextdoor post. At the top, there is a search bar and a prompt to "Post a message, event, poll or urgent alert". The post is by "Angela Salerno, Allied Gardens South". The title of the post is "BLACKTOP TOO HOT FOR DOG PAWS". The text of the post reads: "Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...". Below the text, it says "5 May · 📍 Dogs". There are interaction buttons for "Thank" and "Comment", and a reaction count of 130 (with smiley face, heart, and thumbs up icons) and 32 comments. Below the post, there is a section for "See 21 previous comments". One comment is visible from "Jables Benavides, San Carlos-Mission Gorge" with the text "Good reminder. Thank you." and a reaction count of 2 (smiley face and heart icons). At the bottom, the Nextdoor logo is visible, along with the user "Hank Drayton" who has 1.03K subscribers and a "Subscribe" button. There are also buttons for "Like" (0), "Share", "Save", and a menu icon. The video player at the bottom shows "31 views" and "May 14, 2020".

Post a message, event, poll or urgent alert

Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · 📍 Dogs

Thank Comment

😊❤️👍 130 💬 32

See 21 previous comments

Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply 😊❤️ 2

Nextdoor

Hank Drayton
1.03K subscribers

Subscribe

👍 0 🗨️ Share ➕ Save ⋮

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor mobile app interface. A red rectangular box highlights a real estate listing for a house at 304 Trevino Drive. The listing includes a photo of the house, the name "Steve LoTempio", and text describing an open house event on October 11th. Below the video, the channel name "Discover Florida" is visible with 867 subscribers. The video has 559 views and was published on October 14, 2020. The description text reads: "Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

21

Share

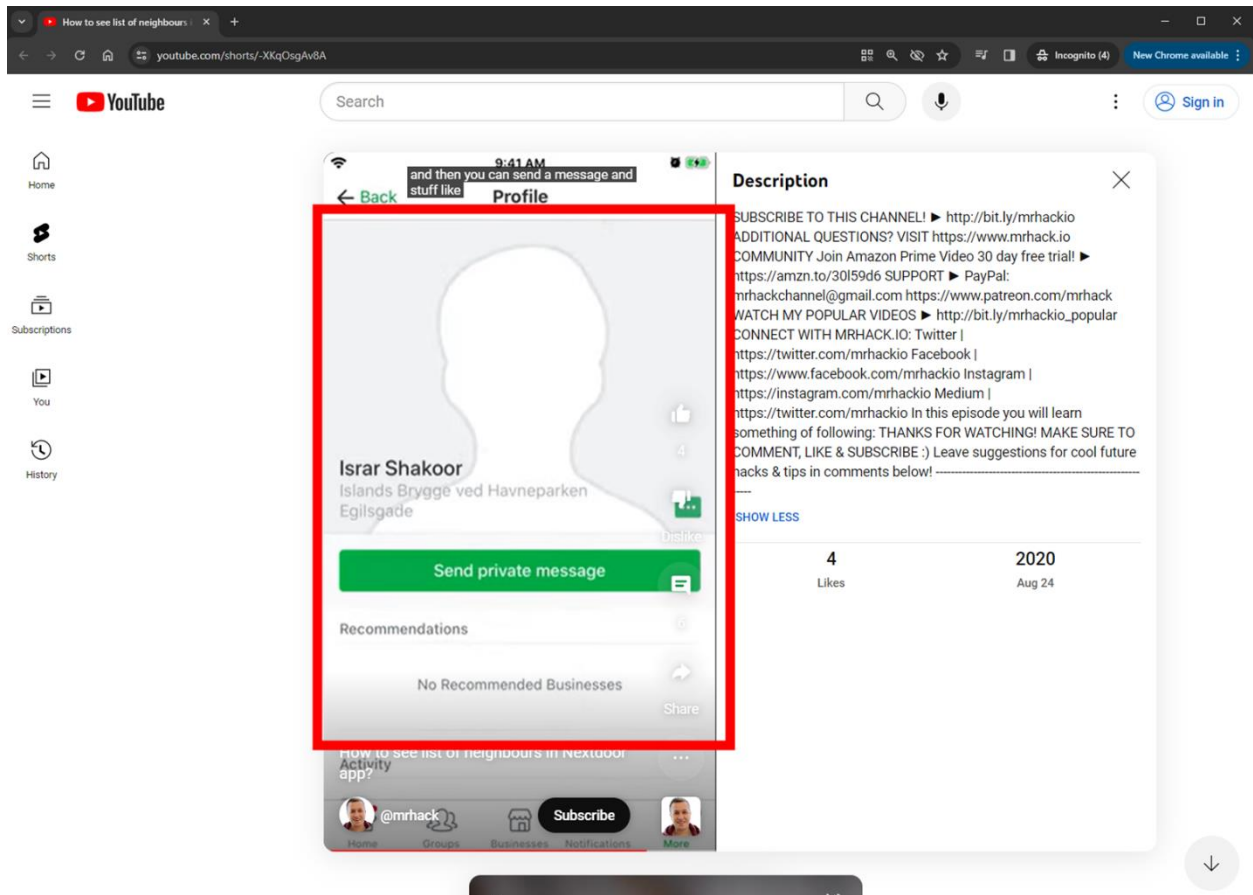
Save

559 views Oct 14, 2020

Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

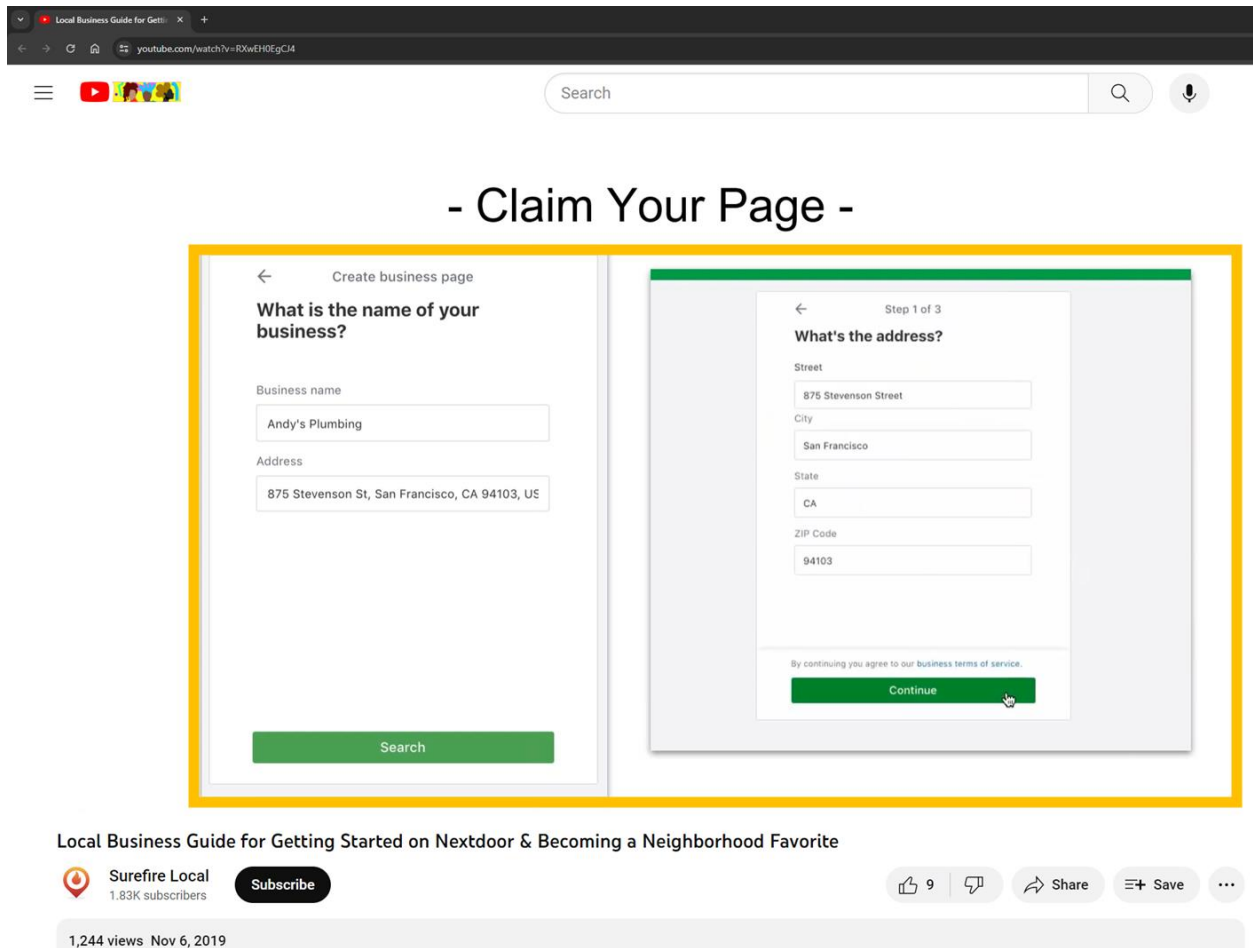
(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



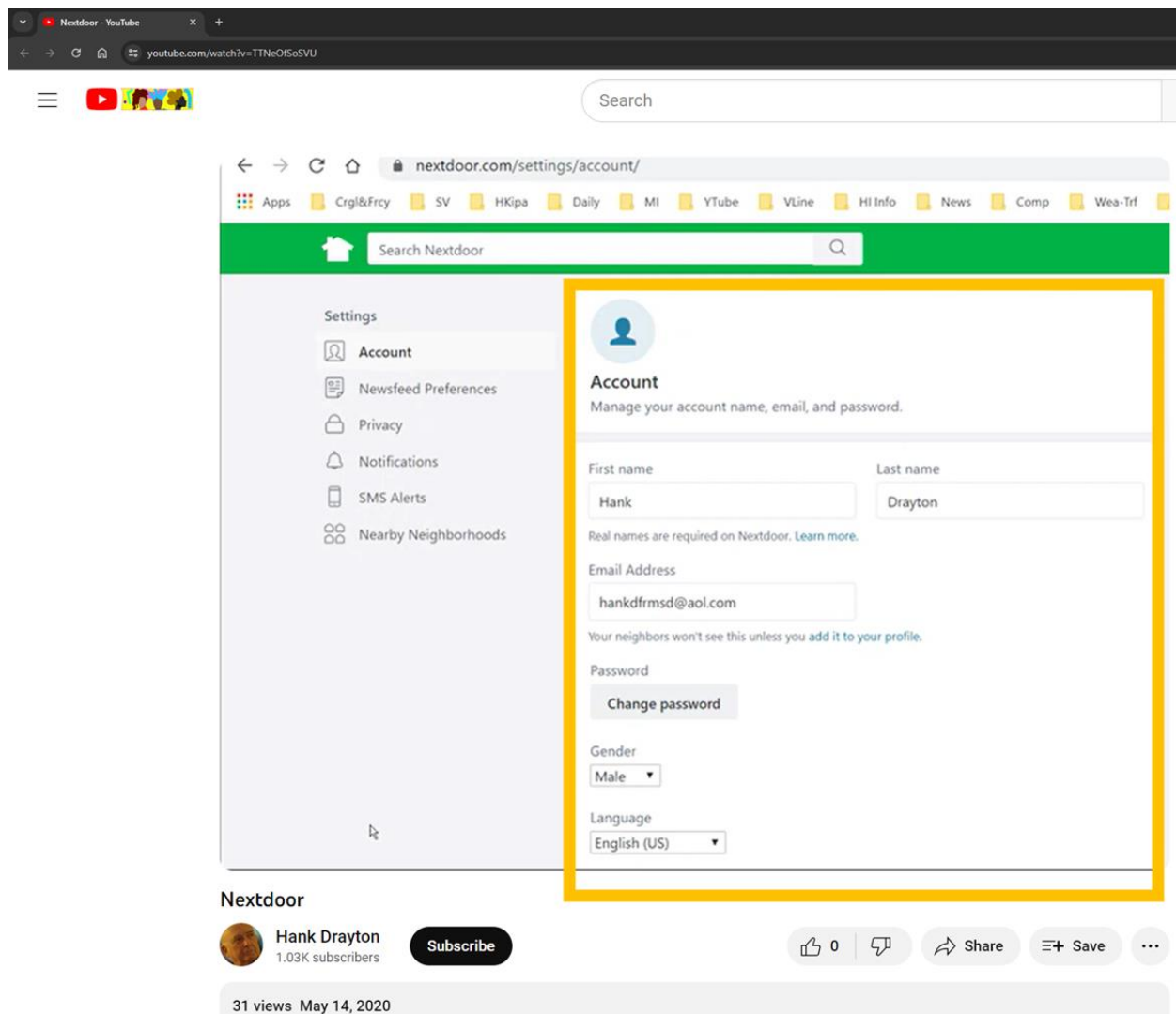
(E.g., <https://www.youtube.com/shorts/-XXqOsgAv8A> (Published August 24, 2020)).

23. The Accused Instrumentality includes an electronic media submissions server subsystem having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions from a plurality of user-submitters, for example content pertaining to their respective user profiles on Accused Instrumentality, as well as multimedia content to be displayed on one or both of the user's profile, the live feed, and online neighborhood groups as discussed and shown in connection with the above discussion. The submissions pertaining to building a user profile, a business profile and to posting on neighborhood groups may include, *e.g.*, photo, hyperlinks and/or textual content. The submissions are provided to Accused Instrumentality via a submissions electronic interface, *e.g.*, a web-based content portal, accessible for example by logging in and selecting options to

upload such content or import content, configured to receive such electronic media, from a plurality of user-submitters over a public network (*e.g.*, the Internet) and stored, via an uploading process, in said electronic media submissions database for use in distribution to other users of Accused Instrumentality.



(*E.g.*, <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).



(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor.com website interface. At the top of the website, there is a navigation bar with the Nextdoor logo, a search bar, and a "Sign in" button. Below the navigation bar, the main content area is divided into several sections. On the left, there is a sidebar menu with options like "Home", "Solivita", "Map", "Digest", "Neighborhood", "Treat Map", "Businesses", "For Sale & Free", "Local Deals", "Events", "Real Estate", "Safety", "Lost & Found", "Documents", and "General". The main content area features a post by Christine Himick, a Solivita member, titled "Free bromeliads" with a photo of several potted plants. To the right of the post, there is a "Treat Map" section with a "View map" button. At the bottom of the video, there is a description box with the following text:

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

21

Share

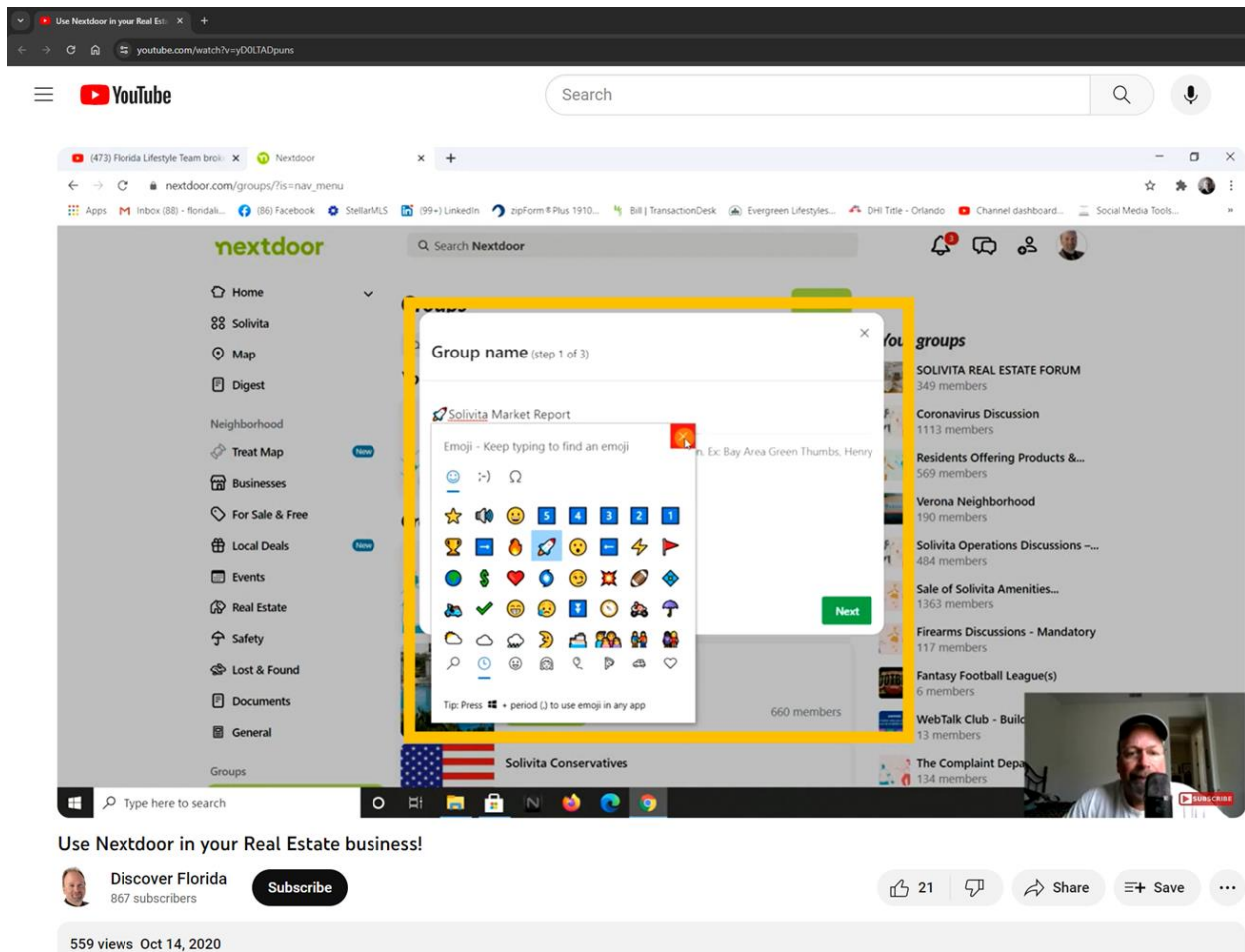
Save

559 views Oct 14, 2020

Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Only Businesses that have received at least one recommendation will appear in the Recommendations section

Members can only see recommendations from their residential neighbors and nearby neighbors

Having more recommendations will help your business appear higher in search results

Search

Recommendations section

Business Page

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local
1.83K subscribers

Subscribe

9

Share

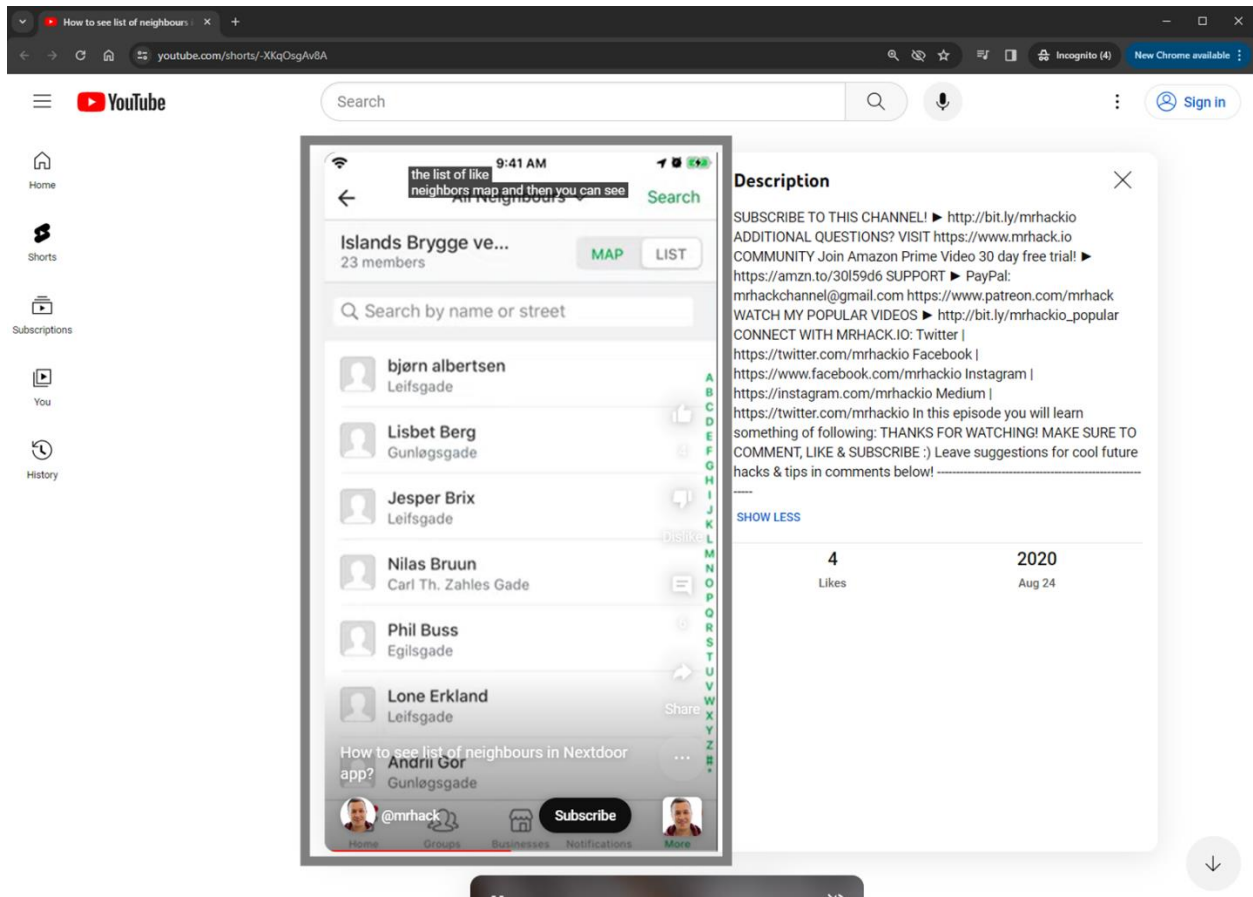
Save

1,244 views Nov 6, 2019

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

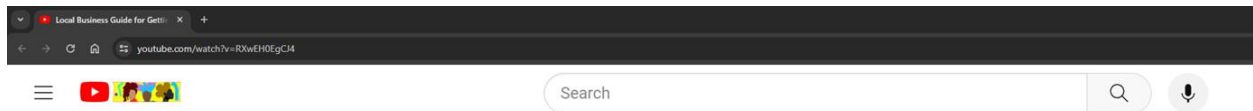
The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor website interface. A yellow box highlights a green "Create" button in the "Groups" section. Below this, a modal window titled "You're invited" shows an invitation to join the "Golf Cart Access To Marketplace Discussion Group". The "Groups near you" section lists several groups, including "TRIVIA Lovers of Solivita", "Solivita Democratic Club", and "Solivita Conservatives". The "Your groups" section on the right lists groups like "SOLIVITA REAL ESTATE FORUM", "Coronavirus Discussion", and "Residents Offering Products &...". The video description below the player reads: "559 views Oct 14, 2020 Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

24. The electronic media submissions database of Accused Instrumentality used by Nextdoor which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission. As shown below, data identifying the user-submitter includes, *e.g.*, a name and/or a logo or profile picture displayed as a thumbnail. Data indicating content for each electronic media submission includes a photo, textual, and/or “tag” or other metadata content.



- Complete Your Profile -

Hair Tactics
1835 SW Martinazzi Ave, Tualatin, O...

Local Deals
Your Reputation
Neighbor Comments
Inbox
Business Profile
Claim another page

Help · Guidelines · Privacy
About · Jobs · Press · Blog
© 2019 Nextdoor

Basic Information
Help neighbors get to know your business

Business name: **Hair Tactics**

Background image: [Map of Tualatin, OR]

Logo image: [Hair Tactics logo]

Greeting message: Hair Tactics is just over 2 years old. Created by hairstylist and industry educator Brenda Lutu Clayton. Our salon has 4 full time stylist and 4 part time stylist. We offer color, haircutting, Waxing, eyelash extensions, Brazilian Blowouts and barbering. All our stylist go through mentorships with additional and ongoing advanced education. We offer a tiered pricing to fit your budget. We have a website www.hairtacticspdx.com as well as Instagram and Facebook. You can also see our extensive work on these pages. We are open Monday- Friday 9-7pm and Saturdays 9-6pm.

License #: Add your license #

[Update basic info](#)

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite



Surefire Local
1.83K subscribers

Subscribe

9



Share

Save



1,244 views Nov 6, 2019

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:

The screenshot shows a Nextdoor business page for 'Sunset Market'. Annotations on the left and right sides provide guidance on how to optimize the page:

- Photo:** Choose a high res, 512x512 pixel photo.
- Greeting message:** Add a greeting message that is both personable and approachable while including your professional qualifications.
- Recommendations:** Ask past and present clients to give you recommendations to build your reputation.
- Address:** Include your company's address.
- Office hours:** Enter in your hours of availability.
- Contact information:** Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication.

The business page itself includes:

- A 'Neighborhood Favorite' badge.
- A profile picture of a person.
- A cover photo of a market stall.
- Business name: 'Sunset Market'.
- Address: '1234 9th Street, San Francisco, CA, 94122'.
- Description: 'A good meal seems to bridge gaps, to warm hearts and somehow, to connect people. I have been very fortunate in my travels. I've eaten the most incredible meals and one thing I know for sure is that wherever I've been, the ... See more'.
- Recommend button.
- Map showing the location.
- Hours: 'Mon-Fri: 8:00am - 6:00pm'.
- Phone number: '415-552-0720'.
- Website: 'sunsetmarket.com'.
- 13 recommendations and 20 neighbors recommending.

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local 1.83K subscribers [Subscribe](#)

1,244 views Nov 6, 2019

9 [Share](#) [Save](#)

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Post a message, event, poll or urgent alert

A Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · 🐕 Dogs

Thank Comment

130 32

See 21 previous comments

J Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply 2

Nextdoor

Hank Drayton
1.03K subscribers

Subscribe

0 Share Save

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player. The video title is "Use Nextdoor in your Real Estate business!". The channel is "Discover Florida" with 867 subscribers. The video has 559 views and was published on Oct 14, 2020. The video content displays the Nextdoor app interface. A real estate listing is highlighted with a blue box. The listing is for a house at 304 Trevino Drive, featuring a screened portico, wood flooring, and an open house on October 11th. The listing is posted by Steve LoTempio, a Solivita member, 5 days ago. The video also shows a "Subscribe" button and a "Share" button.

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

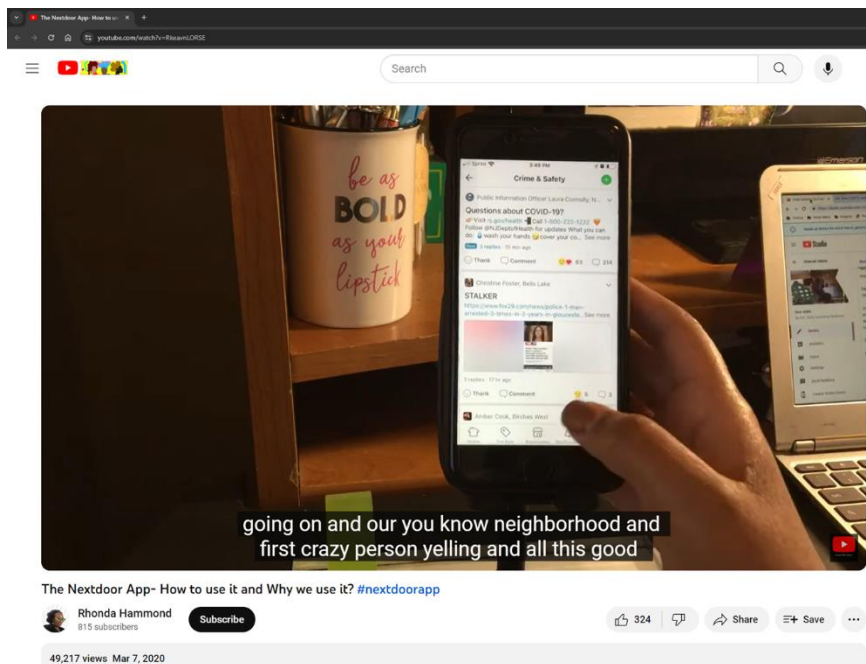
21 | | Share | Save | ...

559 views Oct 14, 2020

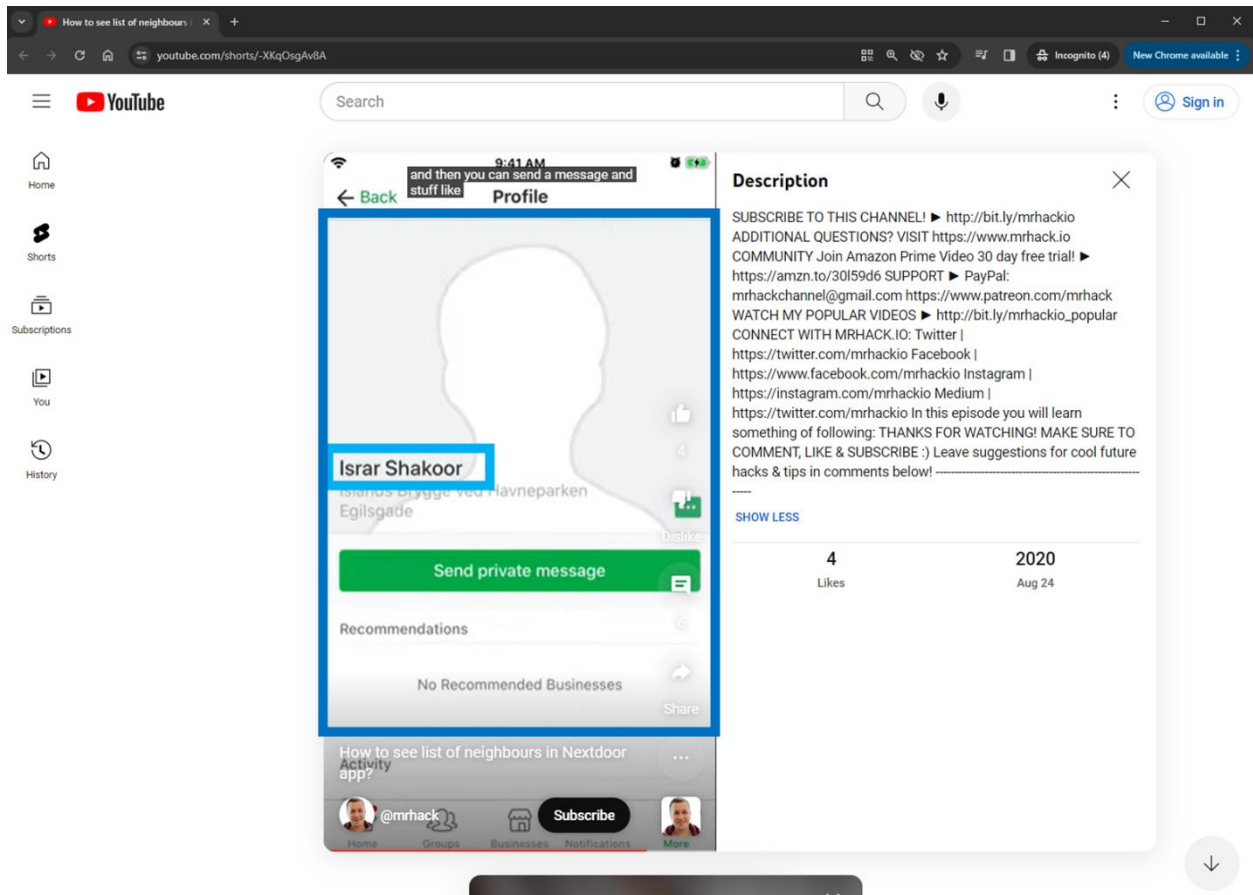
Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

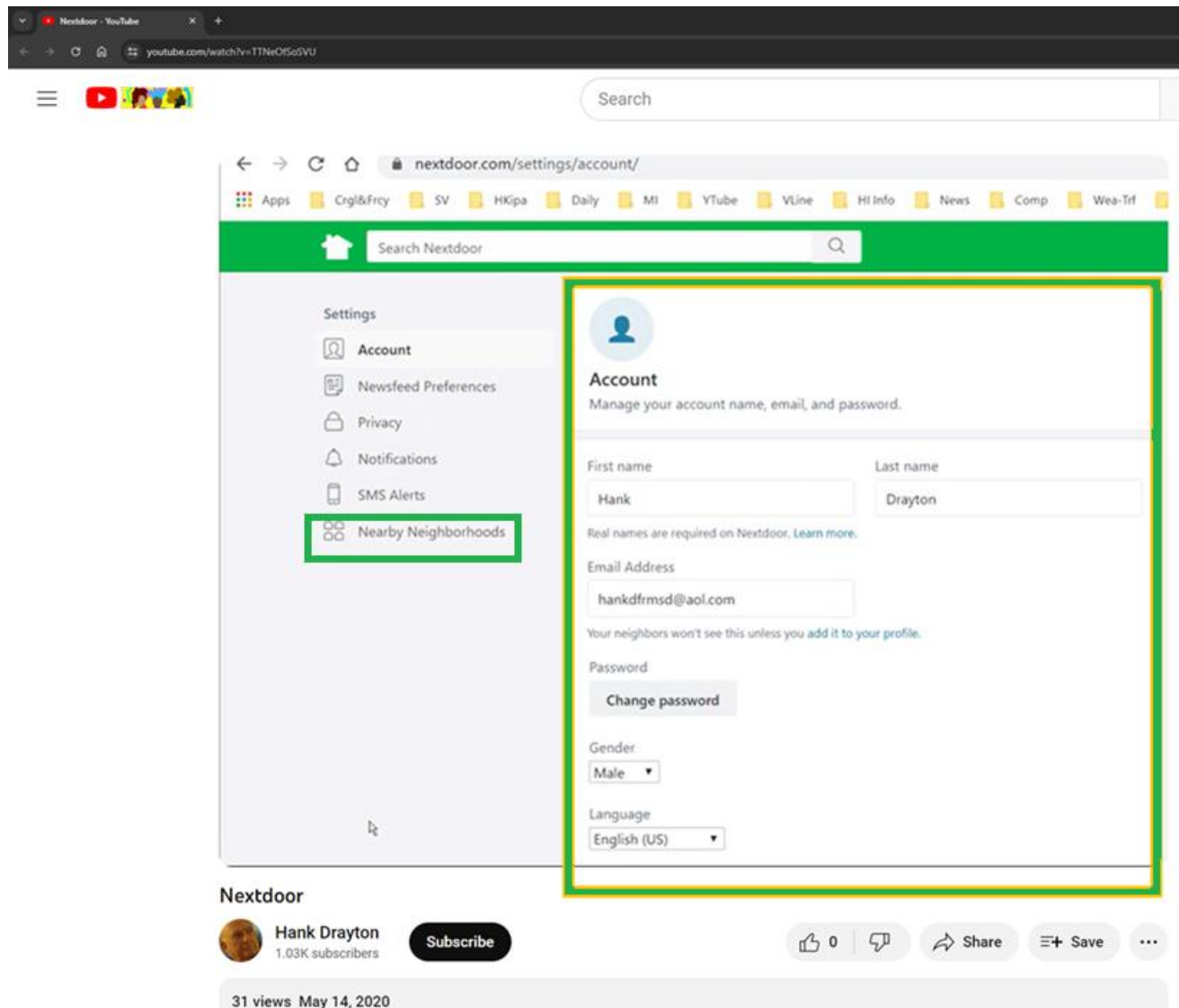


(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).

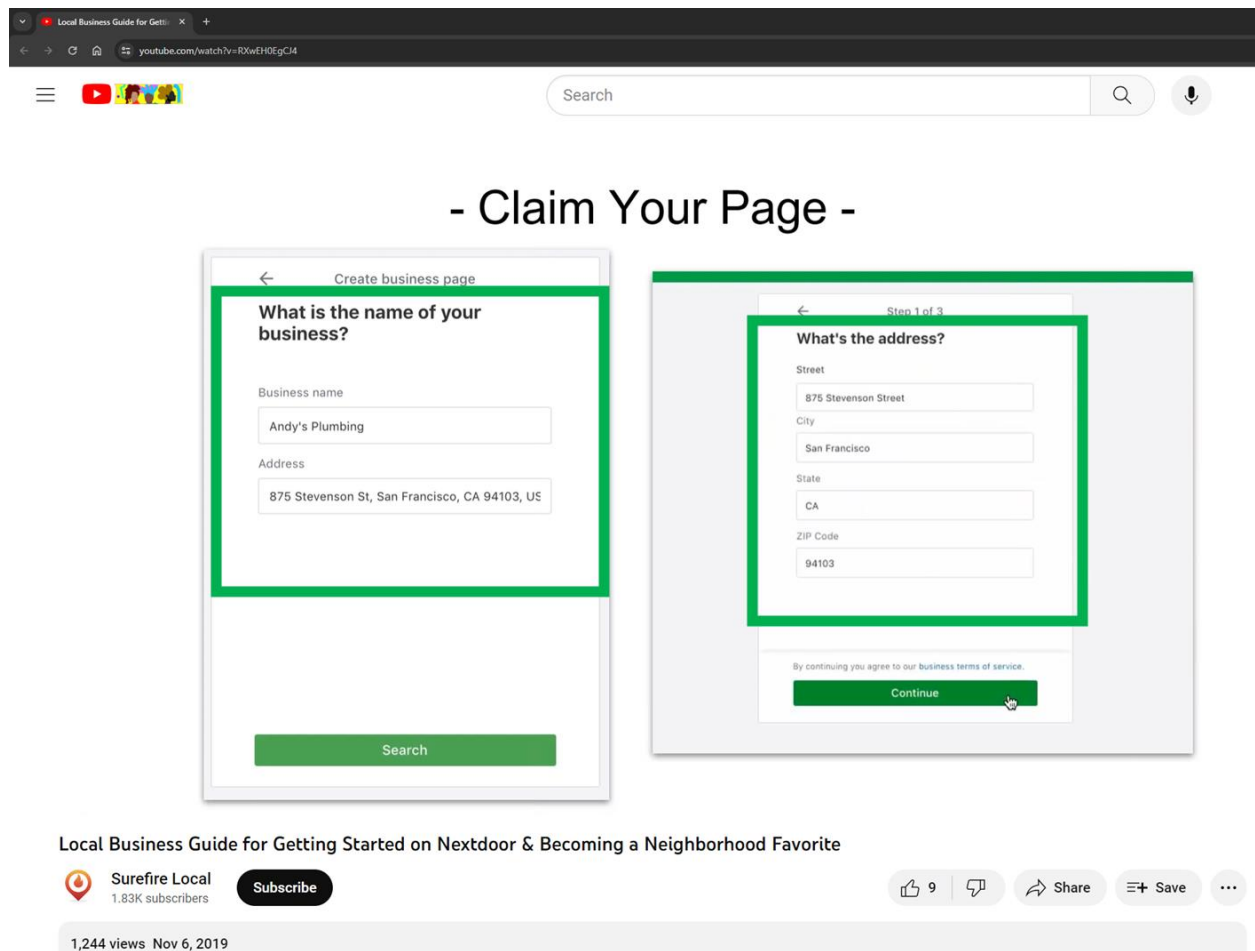


(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

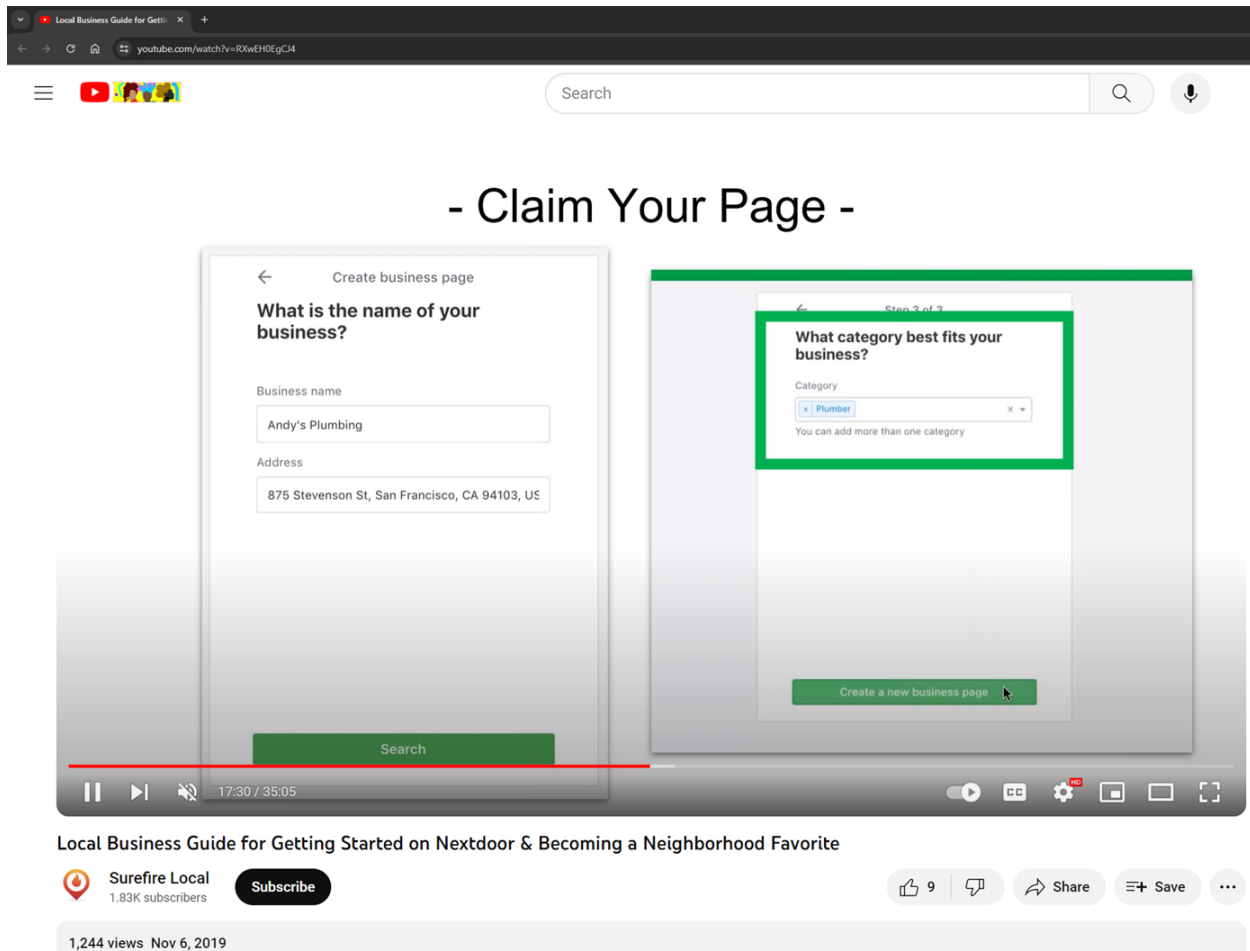
25. Individual users can sign up and create an account (user profile) and/or a business account (business profile) on the Accused Instrumentality, which is stored on a user database. Such user database is stored in memory available through Accused Instrumentality, for example as discussed above. The user attributes of users who create a user profile may include, *e.g.*, a name, age, gender, interests, address and/or a neighborhood selection, and more generally a geographical region, and the like. User attributes for a business profile may also include a business category (*e.g.*, a plumber, dentist auto mechanic and the like, for example as shown below).



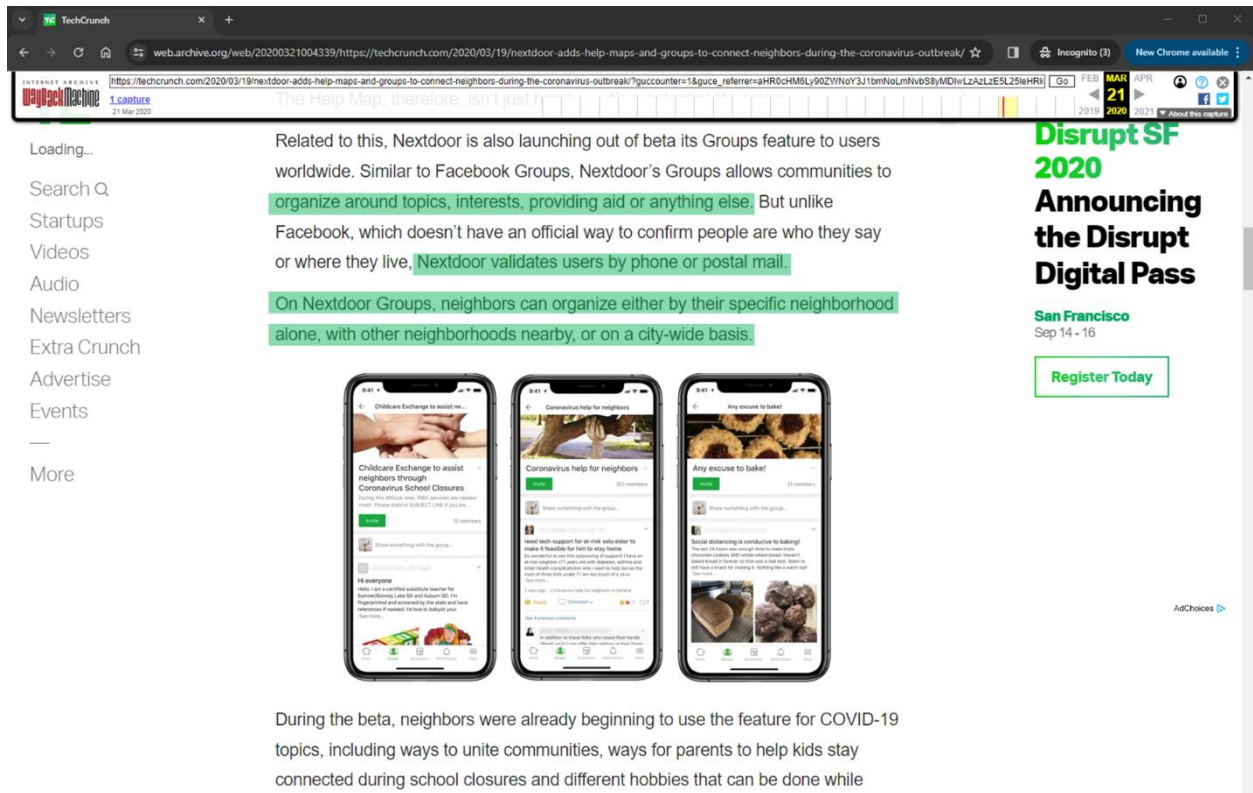
(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).



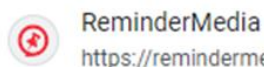
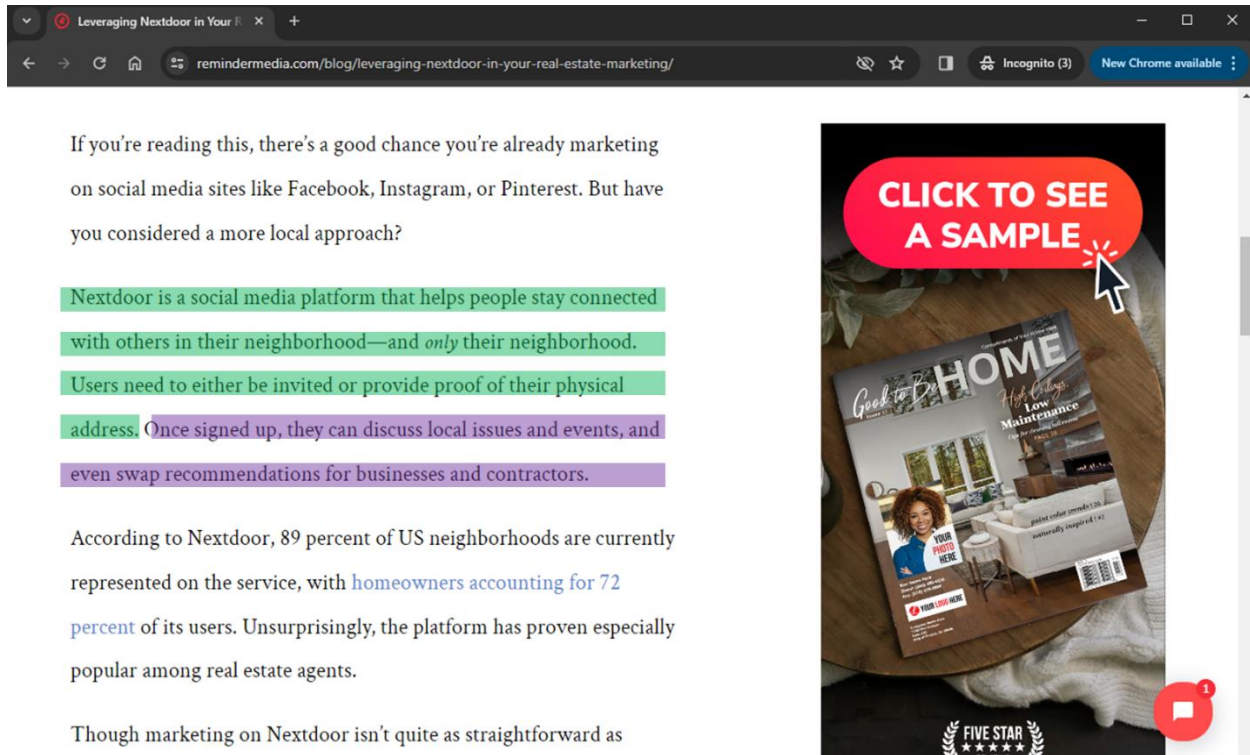
(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).



(E.g., <https://web.archive.org/web/20200321004339/https://techcrunch.com/2020/03/19/nextdoor-adds-help-maps-and-groups-to-connect-neighbors-during-the-coronavirus-outbreak/> (Published March 19, 2020)).

26. The Accused Instrumentality employs an electronic multimedia creator server subsystem operatively coupled to the electronic media submissions server subsystem, necessarily having one or more data processing apparatus in order to manage content, and an electronic creator multimedia database stored on a non-transitory medium, configured to select and retrieve a plurality of electronic media submissions (e.g., user profiles, business profiles and associated posts) on neighborhood feeds with associated photo content and textual content associated with the user-submitter from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server. As can be seen below, such electronic content filter as is used by Nextdoor is based at least in part on at least one of the one or more user

attributes, such as the interests of the user-submitter, desired range of search, business category, and the user-submitter's neighborhood and more generally a geographical region which in turn affect which electronic media submissions, *e.g.*, profiles and associated media within the user-submitter's neighborhood appear to the user) as shown and discussed for example below. Nextdoor uses function-specific subsystems, for example as discussed below.

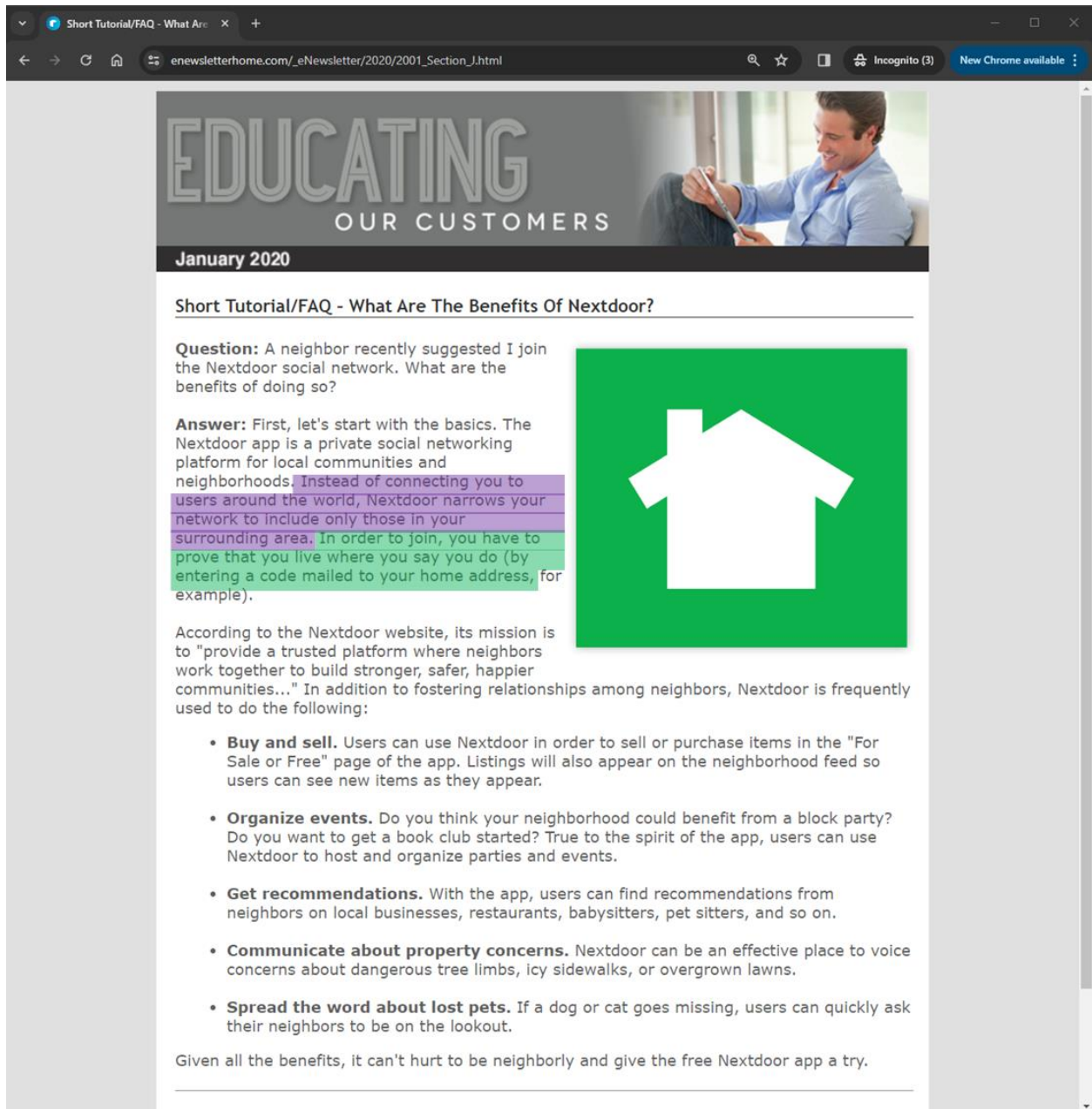


Leveraging Nextdoor in Your Real Estate Marketing

Feb 7, 2019 — **Nextdoor** is a social media platform that helps people stay connected with others in their **neighborhood**—and only their **neighborhood**. Users need to either be ...

(*E.g.*, <https://remindermedia.com/blog/leveraging-nextdoor-in-your-real-estate-marketing/>

(Archived by Google.com on February 7, 2019)).



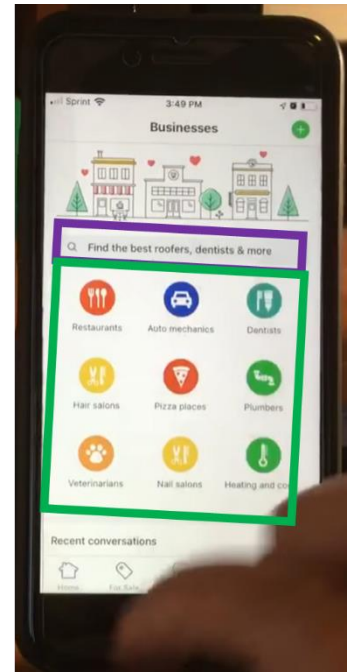
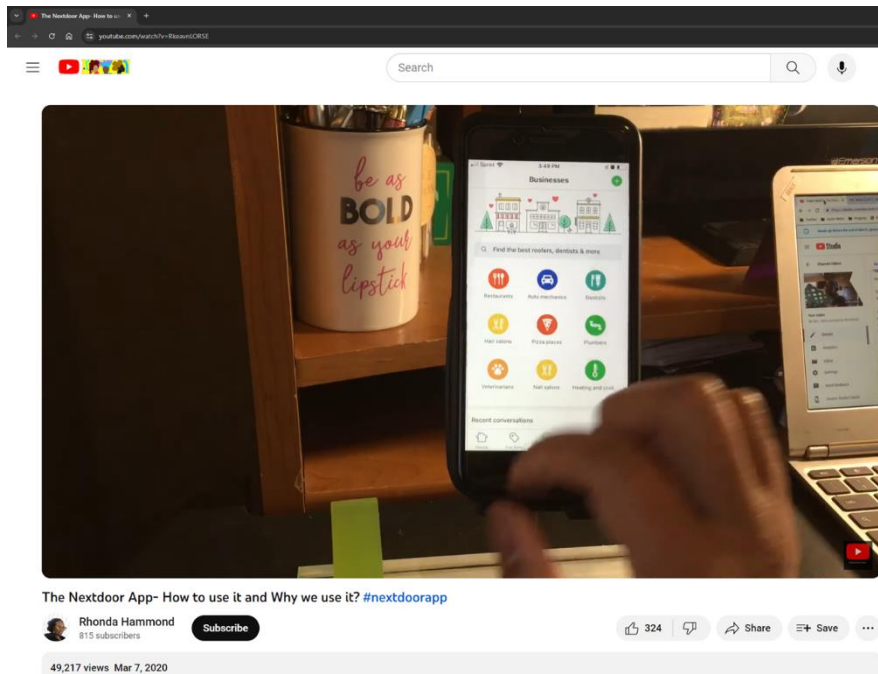
(E.g., https://www.newsletterhome.com/eNewsletter/2020/2001_Section_J.html).

Related to this, Nextdoor is also launching out of beta its Groups feature to users worldwide. Similar to Facebook Groups, Nextdoor's Groups allows communities to **organize around topics, interests, providing aid or anything else.** But unlike Facebook, which doesn't have an official way to confirm people are who they say or where they live, **Nextdoor validates users by phone or postal mail.**

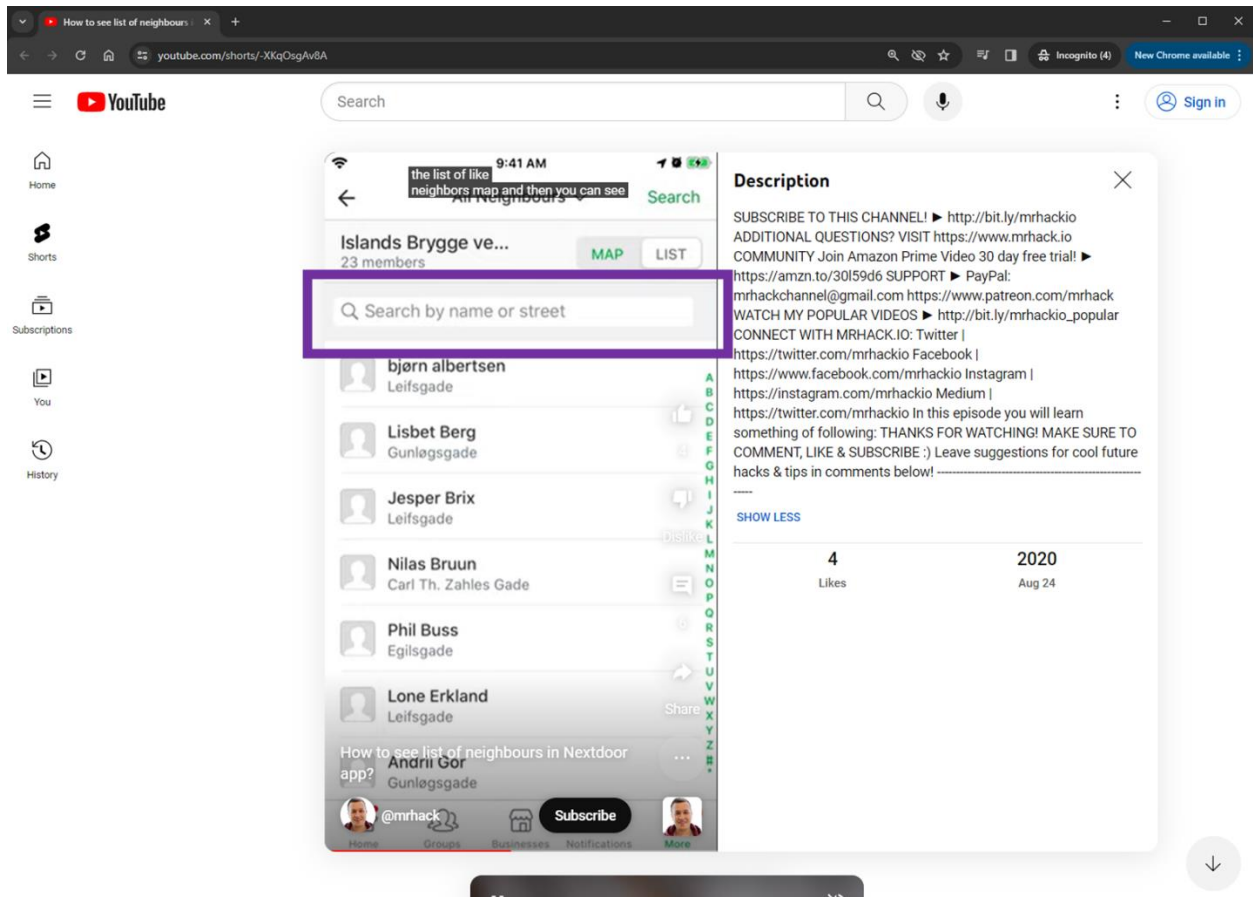
On Nextdoor Groups, neighbors can organize either by their specific neighborhood alone, with other neighborhoods nearby, or on a city-wide basis.

During the beta, neighbors were already beginning to use the feature for COVID-19 topics, including ways to unite communities, ways for parents to help kids stay connected during school closures and different hobbies that can be done while

(E.g., <https://web.archive.org/web/20200321004339/https://techcrunch.com/2020/03/19/nextdoor-adds-help-maps-and-groups-to-connect-neighbors-during-the-coronavirus-outbreak/>
(Published March 19, 2020)).

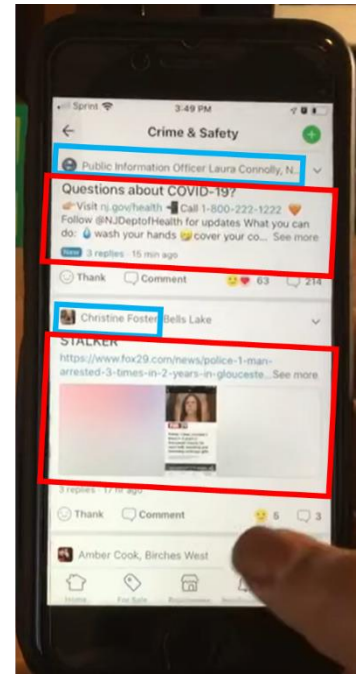
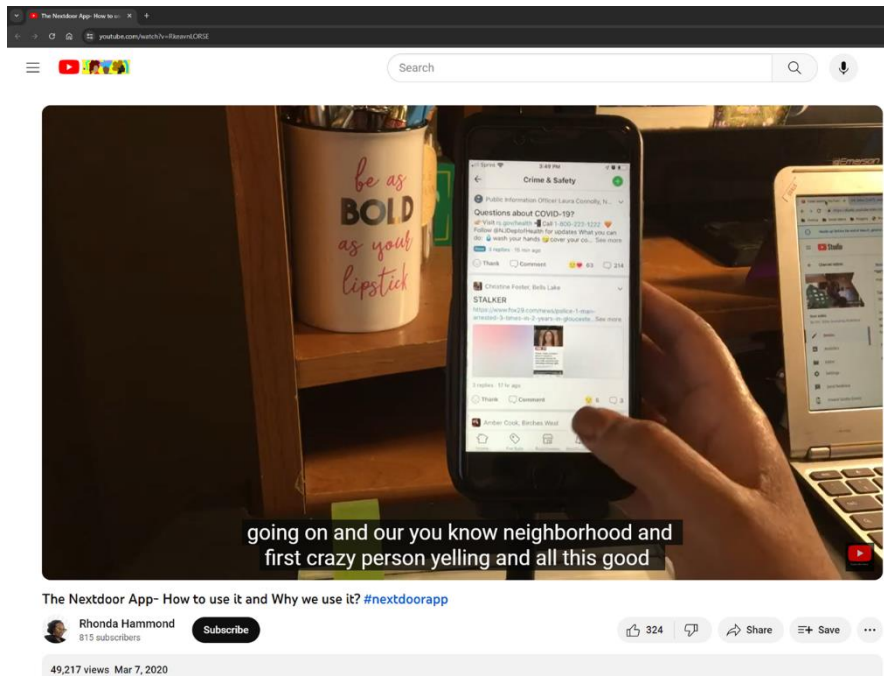


(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).

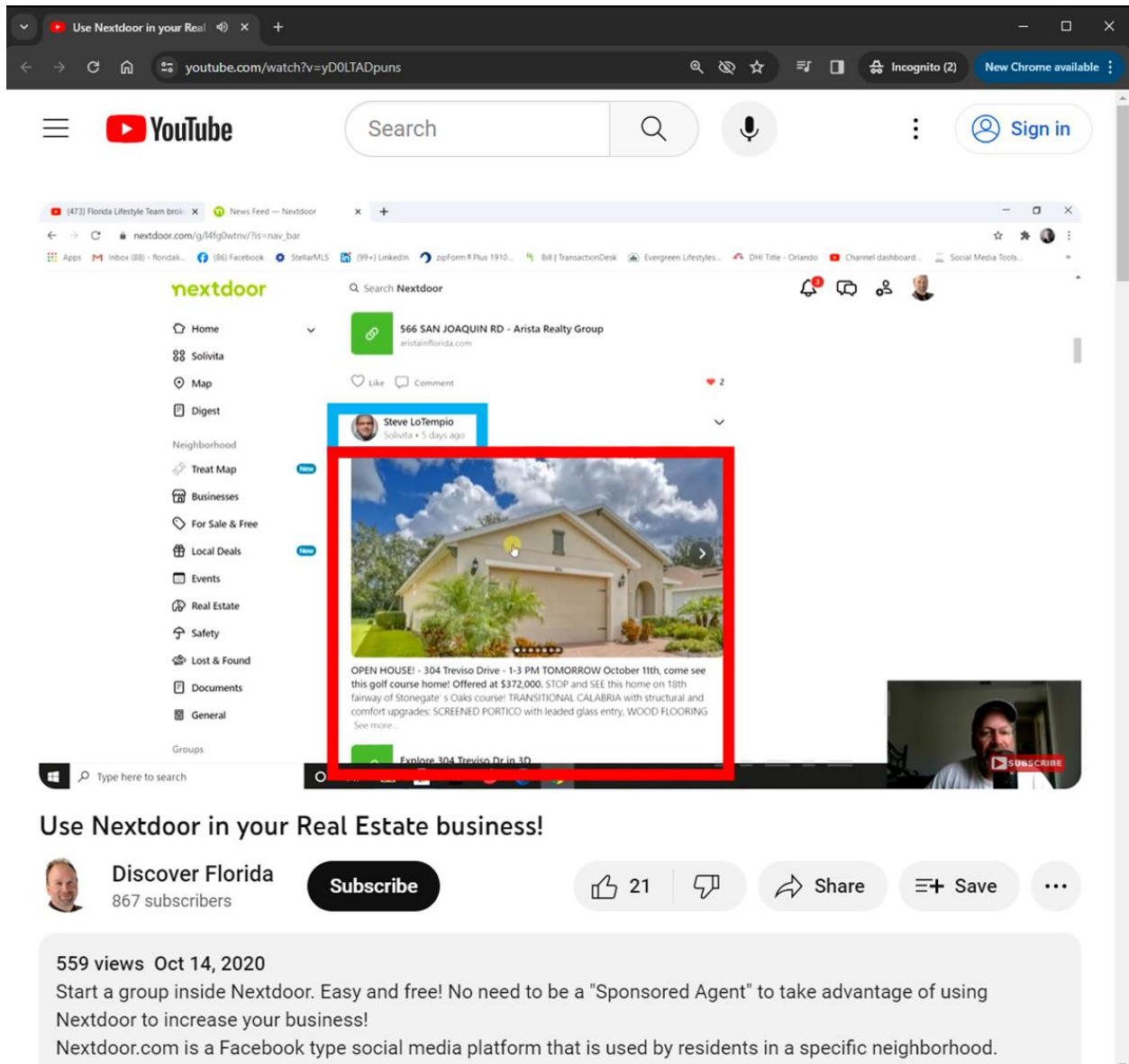


(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

27. Such electronic content filter is used by Accused Instrumentality to develop multimedia content (*e.g.*, the profiles and/or various content as discussed above) associated with the user-submitter to be electronically available for viewing on user devices (*e.g.*, devices such as computers and smart phones incorporating browsers or apps) wherein the identification of the submitter (*e.g.*, a user's name and profile picture) is maintained with each selected and retrieved submission within the multimedia content, for example as shown below.



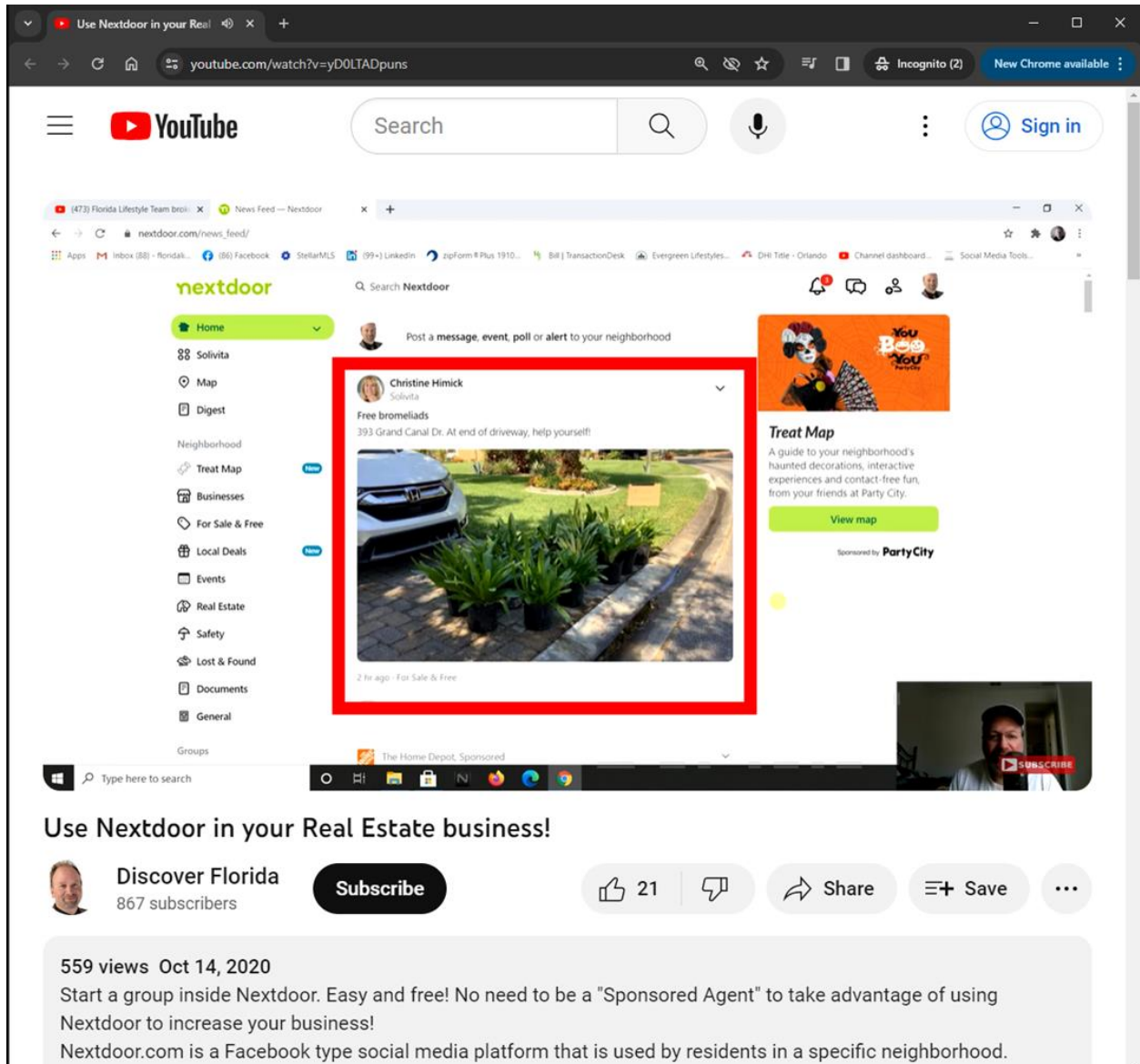
(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).



(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

28. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve multimedia profile and/or post content with associated photo, profile picture, and textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with user profiles and posts is provided on various user devices

(e.g., a computer or other device with a web browser or app) in response to a user logging in to Accused Instrumentality. Nextdoor uses function-specific subsystems, for example as discussed below.



(E.g., <https://www.youtube.com/watch?v=yD0LTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:

The video shows a Nextdoor business page for 'Sunset Market' (Farmer's market, 1234 9th Street, San Francisco, CA, 94122). The page is highlighted with a red border. The page includes a photo of a person holding a sign that says 'RADISH', a greeting message, and a recommendation from a neighbor. The page also shows the business's address, office hours (Mon-Fri: 8:00am - 6:00pm), and contact information (415-552-0720, sunsetmarket.com).

Photo
Choose a high res, 512x512 pixel photo

Greeting message
Add a greeting message that is both personable and approachable while including your professional qualifications.

Recommendations
Ask past and present clients to give you recommendations to build your reputation.

Address
Include your company's address

Office hours
Enter in your hours of availability

Contact information
Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local
1.83K subscribers

Subscribe

1,244 views Nov 6, 2019

9 9 Share Save

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

The screenshot shows a web browser window with the address bar displaying "youtube.com/watch?v=TTNeOfSoSVU". The page content is a Nextdoor post. At the top, there is a search bar and a prompt to "Post a message, event, poll or urgent alert". Below this is the user profile for "Angela Salerno, Allied Gardens South". The post title is "BLACKTOP TOO HOT FOR DOG PAWS". The text of the post reads: "Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...". The post is dated "5 May" and categorized under "Dogs". It has 130 reactions (represented by smiley face, heart, and thumbs up icons) and 32 comments. Below the post, there is a section for "See 21 previous comments". A comment from "Jables Benavides, San Carlos-Mission Gorge" is visible, stating "Good reminder. Thank you." and dated "1 day ago". At the bottom of the screenshot, the Nextdoor channel "Hank Drayton" is shown with 1.03K subscribers, a "Subscribe" button, and video statistics: "31 views May 14, 2020".

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor mobile app interface. A red rectangular box highlights a real estate listing for a house at 304 Trevino Drive. The listing includes a photo of the house, the name "Steve LoTempio", and text describing an open house event on October 11th. Below the video, the channel name "Discover Florida" is visible with 867 subscribers. The video has 559 views and was published on October 14, 2020. The description text reads: "Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

21

Share

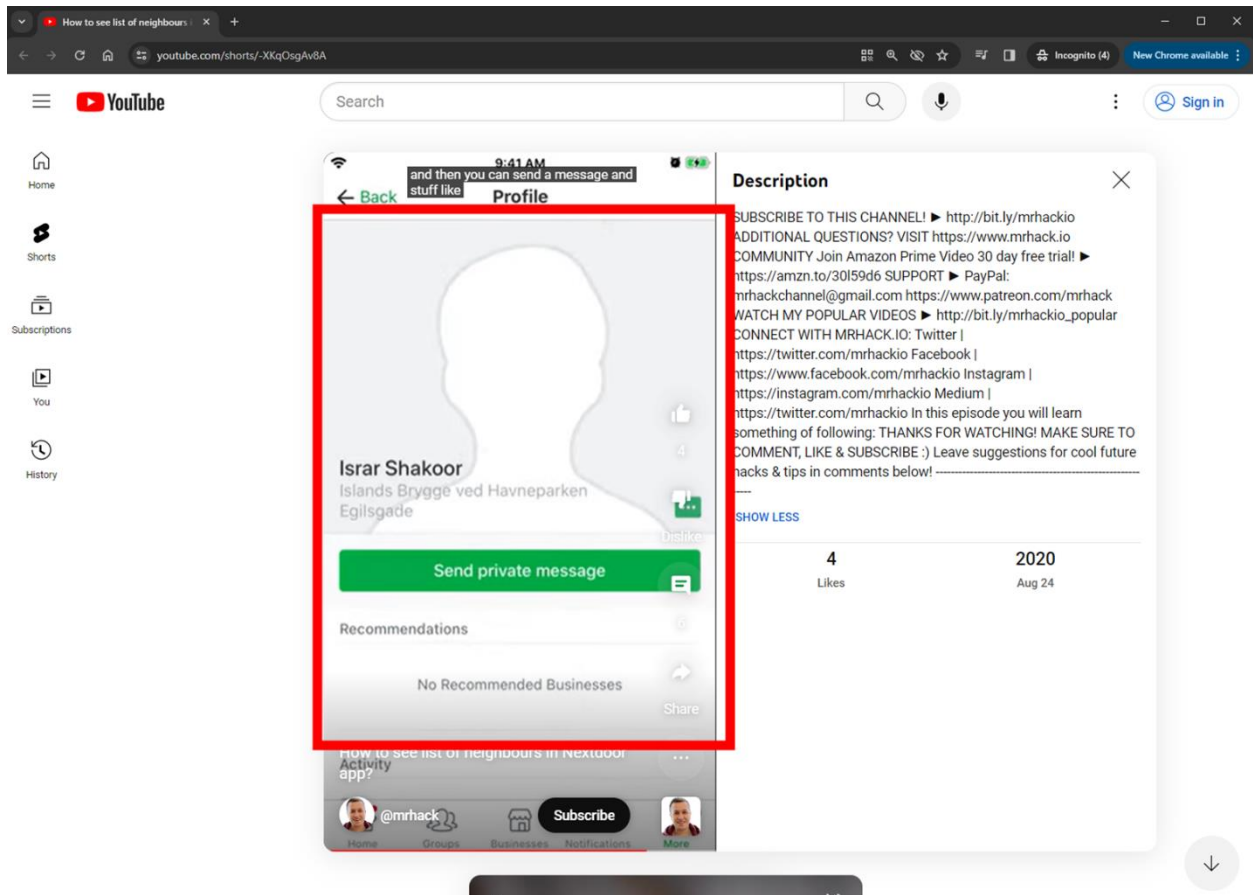
Save

559 views Oct 14, 2020

Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/shorts/-XXqOsgAv8A> (Published August 24, 2020)).

29. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate (e.g., by the users choices with respect to a selection of a “Thank” and or a smiley face icon, a heart icon or a like icon) an electronically available multimedia content (e.g., a multimedia profile provided by a user-submitter, with accompanying photo and/or textual content). Users may also elect to post a Recommendation for business profiles. Nextdoor uses function-specific subsystems, for example as discussed below.

The screenshot shows a Nextdoor post on a mobile app interface. At the top, there's a navigation bar with the Nextdoor logo and a search bar. Below that, a prompt says "Post a message, event, poll or urgent alert". The post is from Angela Salerno, located in Allied Gardens South. The post title is "BLACKTOP TOO HOT FOR DOG PAWS". The text of the post reads: "Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...". The post is dated "5 May" and is categorized under "Dogs". Below the post, there are interaction buttons: "Thank" (highlighted with a yellow box), "Comment" (with a dropdown arrow), and a reaction summary showing "130" reactions (highlighted with a yellow box) and "32" comments. Below the main post, there's a section for "See 21 previous comments". One comment from Jables Benavides, located in San Carlos-Mission Gorge, is highlighted with a red box and reads "Good reminder. Thank you.". This comment is dated "1 day ago" and has "2" reactions (highlighted with a yellow box). At the bottom of the screen, there's a channel card for "Nextdoor" by Hank Drayton, with 1.03K subscribers and a "Subscribe" button. Below the channel card, it shows "31 views" and the date "May 14, 2020". At the very bottom, there are buttons for "Like" (0), "Comment", "Share", "Save", and a menu icon.

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Search

Post a message, event, poll or urgent alert

Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · Dogs

Thank Comment

130 32

See 21 previous comments

Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply

2

Nextdoor

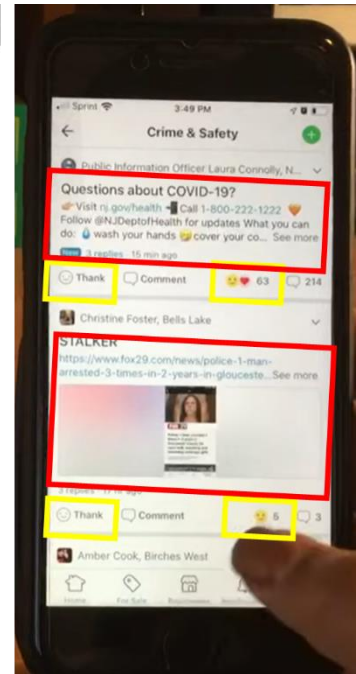
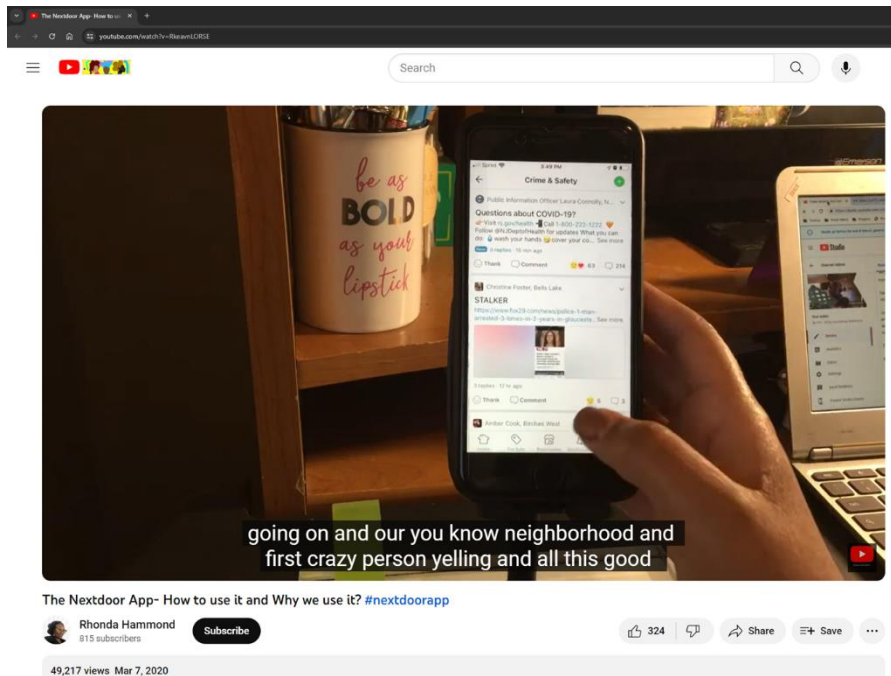
Hank Drayton
1.03K subscribers

Subscribe

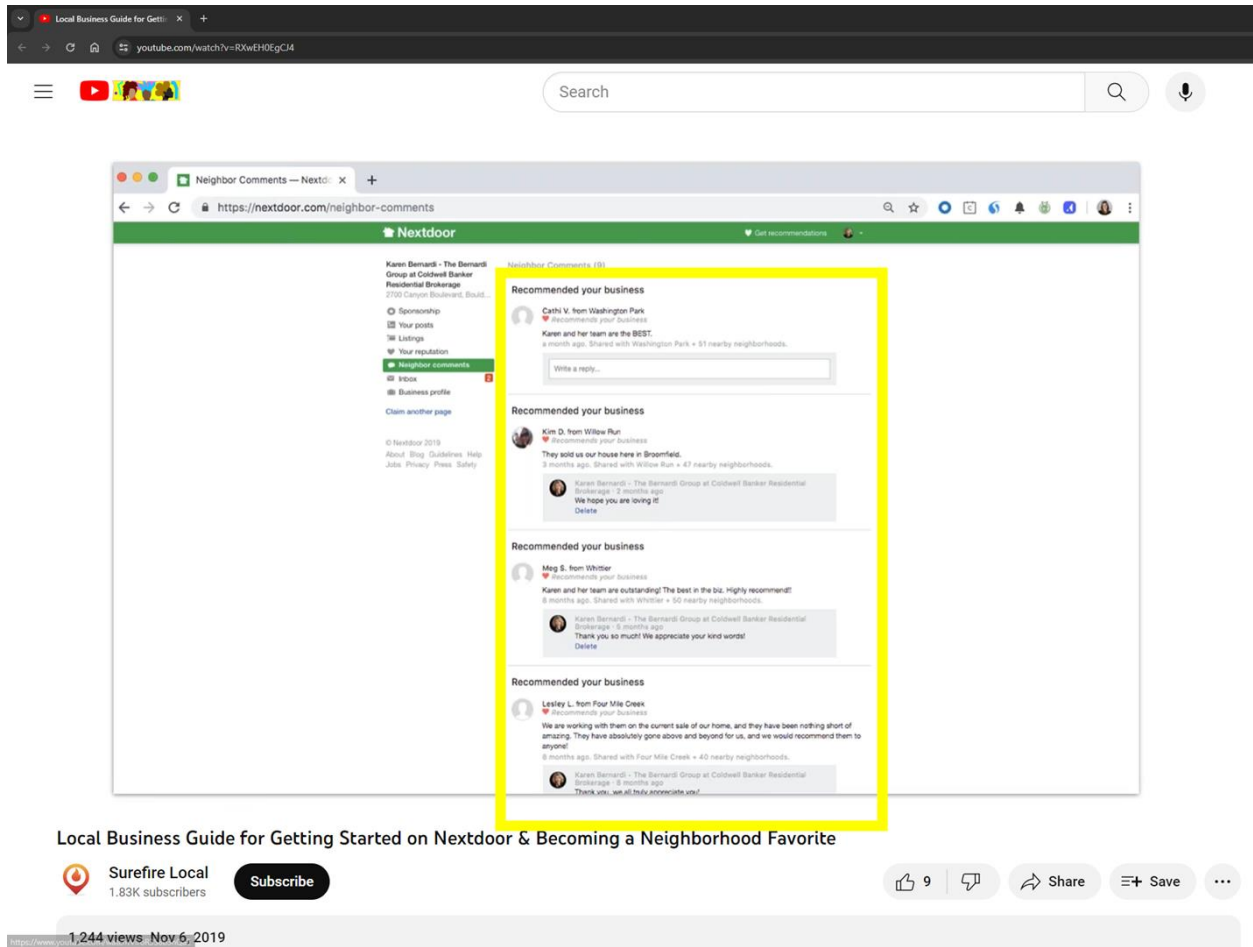
0 Comment Share Save

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).



(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

30. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '480 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

31. To the extent marking is required, VCA has complied with all marking requirements.

IV. COUNT II **(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,477,665)**

32. Plaintiff incorporates the above paragraphs herein by reference.

33. On October 25, 2016, United States Patent No. 9,477,665 (“the ‘665 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘665 Patent is titled “Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same.” A true and correct copy of the ‘665 Patent is attached hereto as Exhibit B and incorporated herein by reference.

34. VCA is the assignee of all right, title, and interest in the ‘665 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘665 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the ‘665 Patent by Defendant.

35. The application leading to the ‘665 patent was filed November 16, 2012, which was a continuation of application no. 11/978,781, which issued as United States Patent No. 8,340,994, which was a continuation of application no. 09/565,438 which issued as United States Patent No. 7,308,413. (Ex. B at cover). The ‘665 patent was first assigned to Virtual Creative Artists, LLC. (*Id.*).

36. The ‘665 Patent shares the identical specification as the ‘480 patent and therefore VCA incorporates the background and discussion of the invention in Paragraphs 11-18. Furthermore claim 1 involves a system for generating multimedia content. The claim requires, among other things, electronically generating a multimedia file from the retrieved electronic media Submissions in accordance with a selected digital format, wherein the identification of the submitter is maintained with each retrieved submission within the multimedia file. The claim requires electronically transmitting the multimedia file to a plurality of publicly accessible web servers to be electronically available for viewing on one or more user devices over a public network via a web-browser and. This allows electronically transmit data indicating votes or rating

of multimedia content in a much quicker and easier fashion based on specific user criteria. There is nothing abstract about this very particular, unconventional, and non-routine system for the generation of multimedia content as specifically claimed and there is no risk of preempting creating and distribution contention generally, or even within the context of the Internet.

37. The invention is a highly technical electronic process that cannot be achieved with the human mind and is instead rooted in computer technology, including the steps of:

- “electronically retrieving a plurality of electronic media submissions,”
- “electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format,”
- “electronically transmitting the multimedia file to a plurality of publicly accessible web servers to be electronically available for viewing on one or more user devices over a public network via a web-browser,” and
- “providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content.”

38. Each of these subsystems are configured in a very specific (and not generic, unconventional and non-routine manner to offer the novel and non-obvious approach claimed invention. For example, claim 1 requires an “electronic media submissions database,” which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databased required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

39. The claim also provides details to explain how each step operates. For example, the claim requires “electronically retrieving a plurality of electronic media submissions from an electronic media submissions database using an electronic content filter located on one or more data processing apparatus.” Further, “the electronic media submissions database” in this step is further required to “store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission.” The step further requires and “electronic content filter.” The “filter” also includes a very specific algorithm of “being based at least in part on at least one of the one or more user attributes.”

40. The claims also require an “electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format.” Manipulation of multimedia data in accordance with a selected digital format is far from generic and was not routine or conventional at the time of the invention. Further, this step requires that the “electronic media submissions database” “stores data identifying the submitter” and the “the identification of the submitter is maintained with each retrieved submission within the multimedia file.”

41. The claims also require “providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content,” which is a well-defined, specific, and unconventional feature. By including this additional voting/rating feature, the claims avoid any risk of preempting the creation and distribution of content.

42. The invention also has inventive concepts. For example, the claim requires that the filtering tool be at a specific location, remote from the end-users, with customizable filtering features specific to each end user. The “electronic content filter” is located at the server, remote

from the end user, and customizable based on user attributes. The “electron voting” step at the time of the invention was also novel, inventive, and added sufficient inventive contributions to avoid a risk of preempting the creation and distribution of media content. It is clearly possible to create and distribute media content without every having to include a “voting” subsystem on what components should be included in such media content.

43. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the ‘665 patent before the United States Patent and Trademark Office.

44. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the ‘665 Patent in Delaware, and elsewhere in the United States, by employing a computer-based system using <https://nextdoor.com/> (“Accused Instrumentality”) (e.g., <https://nextdoor.com/>).

45. Nextdoor uses a computer-based system for its Accused Instrumentality, to enable user-submitters to create personalized user profiles and browse the profiles of other users based on the user-submitter’s location and neighborhood. User-submitters may create an account and user profile, and link the profile to online neighborhood groups. User-submitters may create multimedia content as a public post which may appear on a live feed of other users within the user-submitter’s location and neighborhood, and other users in the neighborhood or group may interact with the public post. The profiles include multimedia content including image and textual content (e.g., a submitter’s profile picture and an About Me section) which may be shown to other users based on, *inter alia*, user-selected preferences and attributes, and by the user-submitter’s location and neighborhood. Users may also submit multimedia content such as job listings, business listings, and real estate listings as a public post which may appear on a live feed of other users. User-

submitters may also create business profiles and promote business services as posts containing multimedia content on neighborhood groups. This system makes use of one or more data processing apparatus, and a computer readable medium coupled to the one or more data processing apparatus having instructions stored thereon which, when executed by the one or more data processing apparatus, cause the one or more data processing apparatus to perform an electronic method comprising the functions as further discussed below. Nextdoor, during the relevant time period, took advantage of multiple cloud server providers for Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. Nextdoor uses and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor app interface. A red rectangular box highlights a post by Christine Himick, a user in Solivita, titled "Free bromeliads" with the text "393 Grand Canal Dr. At end of driveway, help yourself!". The post includes a photo of several potted bromeliads on a driveway. To the right of the highlighted post is a "Treat Map" sponsored by Party City. Below the video, the channel name "Discover Florida" with 867 subscribers is shown, along with a "Subscribe" button and engagement metrics (21 likes, 0 comments). The video description states: "559 views Oct 14, 2020 Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:

Photo
Choose a high res, 512x512 pixel photo

Greeting message
Add a greeting message that is both personable and approachable while including your professional qualifications.

Recommendations
Ask past and present clients to give you recommendations to build your reputation.

Address
Include your company's address

Office hours
Enter in your hours of availability

Contact information
Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication

Sunset Market
Farmer's market
1234 9th Street, San Francisco, CA, 94122
A good meal seems to bridge gaps, to warm hearts and somehow, to connect people. I have been very fortunate in my travels. I've eaten the most incredible meals and one thing I know for sure is that wherever I've been, the ... See more

1,244 views Nov 6, 2019

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Post a message, event, poll or urgent alert

Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk

See more...

5 May · 📍 Dogs

Thank Comment

😊❤️👍 130 32

See 21 previous comments

Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply 😊❤️ 2

Nextdoor

Hank Drayton
1.03K subscribers

Subscribe

0 0 Share Save

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor mobile app interface. A red rectangular box highlights a real estate listing for a house at 304 Trevino Drive. The listing includes a photo of the house, the name "Steve LoTempio", and text describing an open house event on October 11th. Below the video, the channel name "Discover Florida" is visible with 867 subscribers. The video has 559 views and was published on October 14, 2020. The description text reads: "Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

21

Share

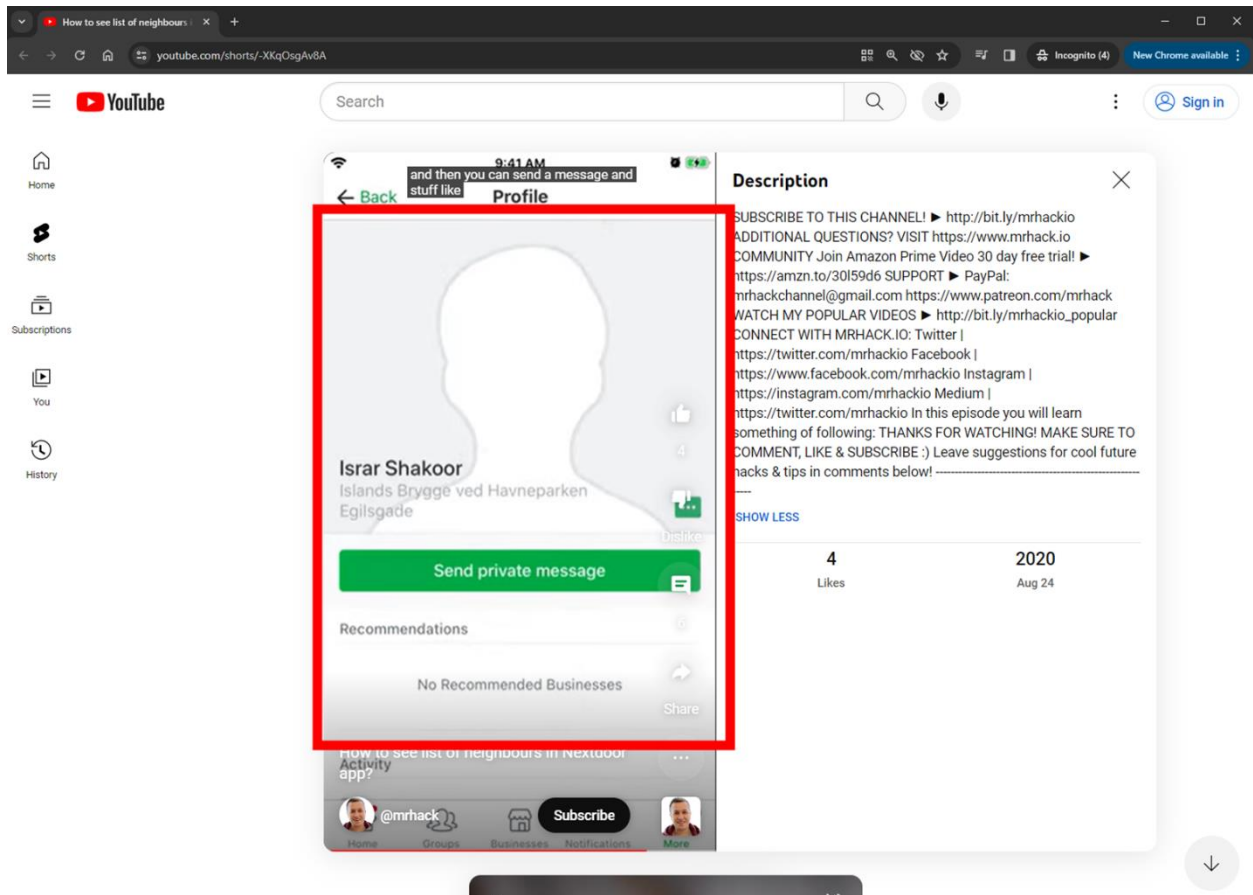
Save

559 views Oct 14, 2020

Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

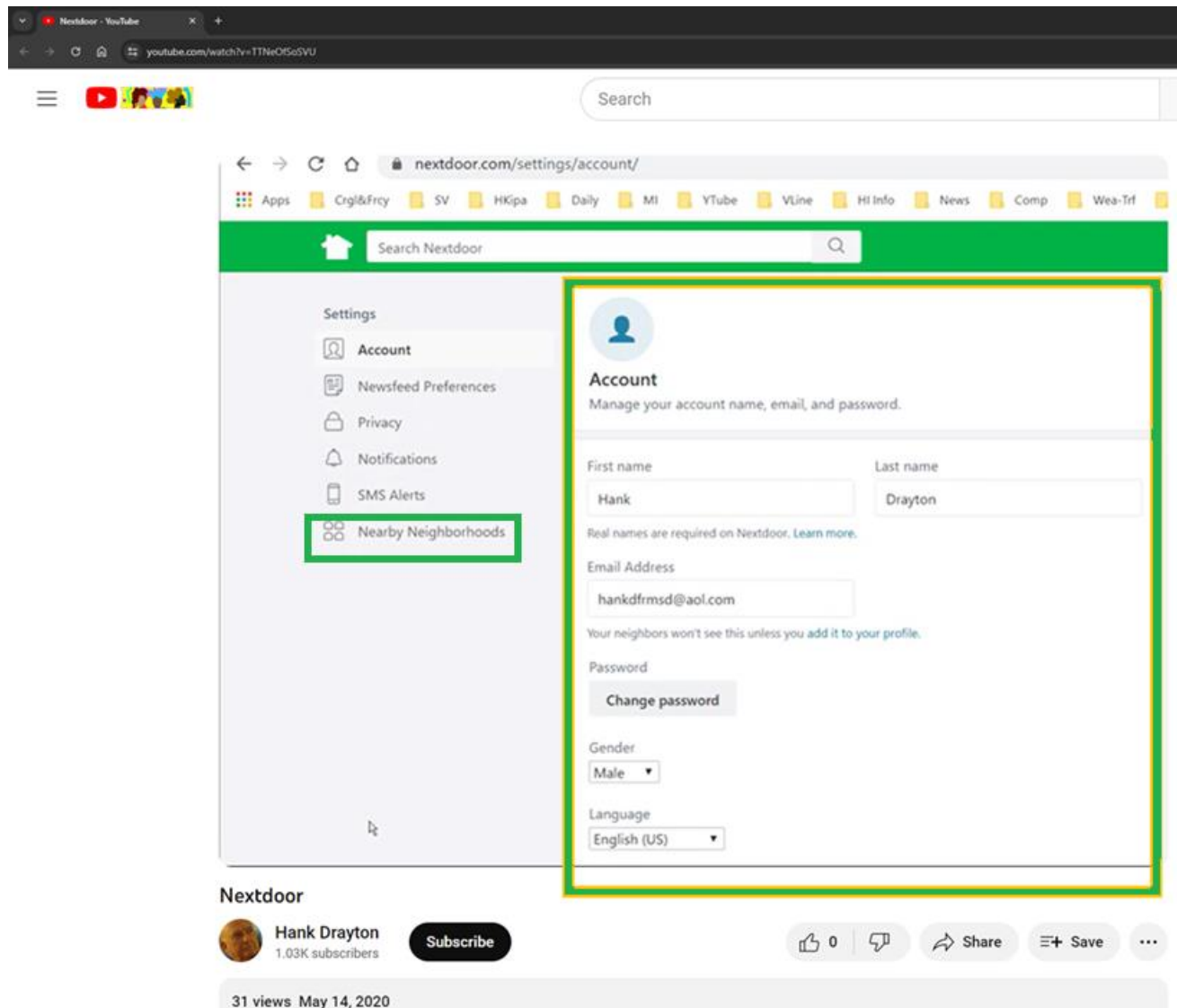
(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



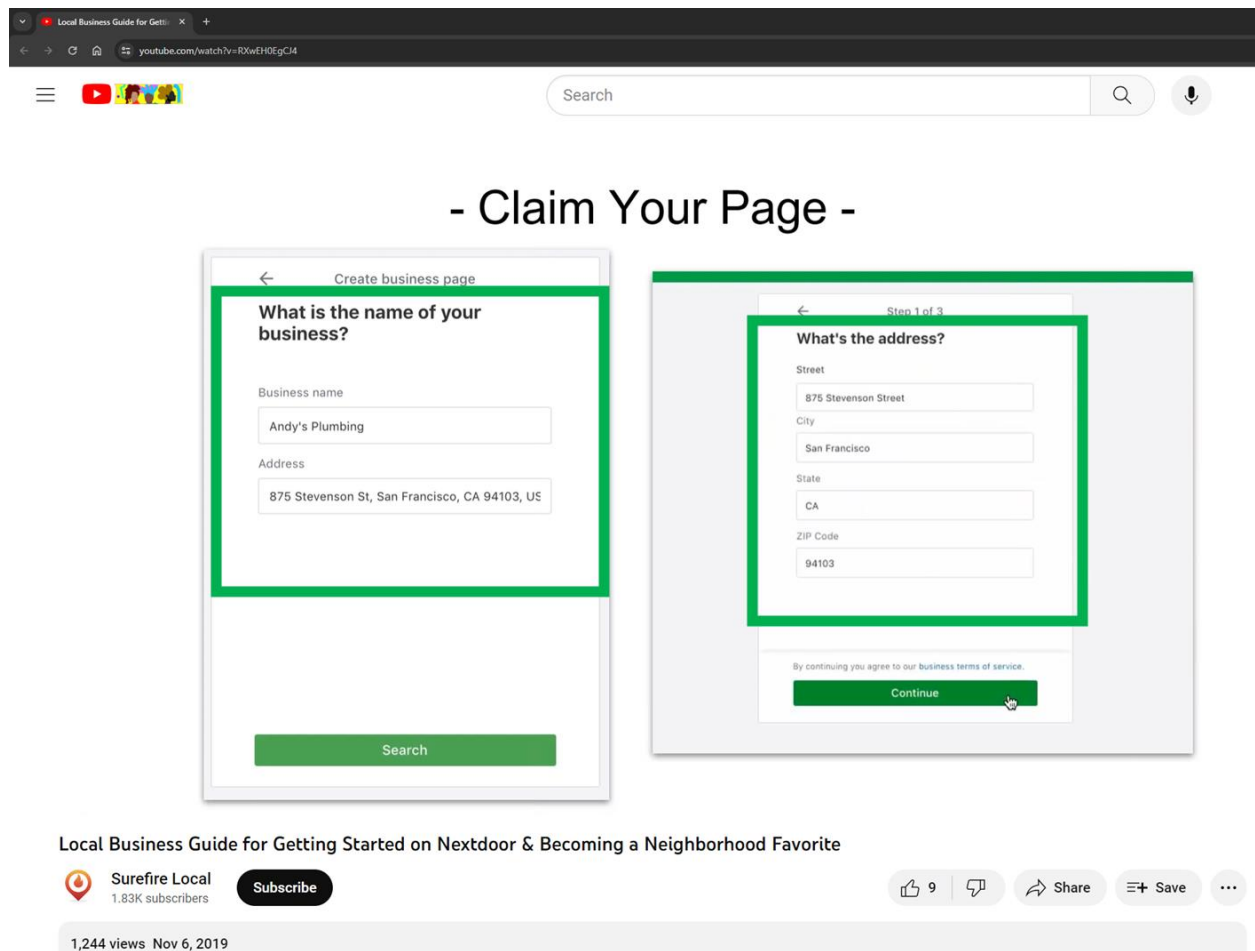
(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

46. The Accused Instrumentality electronically retrieves a plurality of electronic media submissions from an electronic media submissions database on a non-transitory medium, for example multimedia content pertaining to building a user profile on Accused Instrumentality, as well as multimedia content to be displayed on the user's profile or live feed, as discussed and shown above in connection with the above discussion. Individual users can sign up and create an account (user profile) and/or a business account (business profile) on Nextdoor's Accused Instrumentality, which is stored on a user database. Such user database is stored in memory available through Accused Instrumentality, for example as discussed above. The user attributes of users who create a user profile may include, *e.g.*, a name, age, gender, interests, address and/or a

neighborhood selection, and more generally a geographical region, and the like. User attributes for a business profile may also include a business category (*e.g.*, a plumber, dentist auto mechanic and the like, *e.g.*, as shown below) Nextdoor's Accused Instrumentality's retrieval of electronic media (*e.g.*, user profiles, business profiles and associated posts) on neighborhood feeds with associated photo content and textual content associated with the user-submitter from the electronic media submissions database uses an electronic content filter located on the one or more data processing apparatus. As can be seen below, such electronic content filter as is used by Nextdoor is based at least in part on at least one of the one or more user attributes, such as the interests of the user-submitter, desired range of search, business category, and the user-submitter's neighborhood more generally a geographical region which in turn affect which electronic media submissions (*e.g.*, profiles and associated media within the user-submitter's neighborhood) appear to the user, as shown and discussed for example below. Nextdoor uses function-specific subsystems, for example as discussed below.



(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

If you're reading this, there's a good chance you're already marketing on social media sites like Facebook, Instagram, or Pinterest. But have you considered a more local approach?

Nextdoor is a social media platform that helps people stay connected with others in their neighborhood—and *only* their neighborhood. Users need to either be invited or provide proof of their physical address. Once signed up, they can discuss local issues and events, and even swap recommendations for businesses and contractors.

According to Nextdoor, 89 percent of US neighborhoods are currently represented on the service, with homeowners accounting for 72 percent of its users. Unsurprisingly, the platform has proven especially popular among real estate agents.

Though marketing on Nextdoor isn't quite as straightforward as

CLICK TO SEE A SAMPLE

Good to Go HOME

High-End, Low Maintenance

YOUR PHOTO HERE

FIVE STAR

ReminderMedia
https://remindermedia.com › blog › leveraging-nextdo...

Leveraging Nextdoor in Your Real Estate Marketing

Feb 7, 2019 — **Nextdoor** is a social media platform that helps people stay connected with others in their **neighborhood**—and only their **neighborhood**. Users need to either be ...

(E.g., <https://remindermedia.com/blog/leveraging-nextdoor-in-your-real-estate-marketing/>

(Archived by Google.com on February 7, 2019)).


Short Tutorial/FAQ - What Are The Benefits Of Nextdoor?

EDUCATING OUR CUSTOMERS

January 2020

Question: A neighbor recently suggested I join the Nextdoor social network. What are the benefits of doing so?

Answer: First, let's start with the basics. The Nextdoor app is a private social networking platform for local communities and neighborhoods. Instead of connecting you to users around the world, Nextdoor narrows your network to include only those in your surrounding area. In order to join, you have to prove that you live where you say you do (by entering a code mailed to your home address, for example).



According to the Nextdoor website, its mission is to "provide a trusted platform where neighbors work together to build stronger, safer, happier communities..." In addition to fostering relationships among neighbors, Nextdoor is frequently used to do the following:

- **Buy and sell.** Users can use Nextdoor in order to sell or purchase items in the "For Sale or Free" page of the app. Listings will also appear on the neighborhood feed so users can see new items as they appear.
- **Organize events.** Do you think your neighborhood could benefit from a block party? Do you want to get a book club started? True to the spirit of the app, users can use Nextdoor to host and organize parties and events.
- **Get recommendations.** With the app, users can find recommendations from neighbors on local businesses, restaurants, babysitters, pet sitters, and so on.
- **Communicate about property concerns.** Nextdoor can be an effective place to voice concerns about dangerous tree limbs, icy sidewalks, or overgrown lawns.
- **Spread the word about lost pets.** If a dog or cat goes missing, users can quickly ask their neighbors to be on the lookout.

Given all the benefits, it can't hurt to be neighborly and give the free Nextdoor app a try.

(E.g., https://www.newsletterhome.com/eNewsletter/2020/2001_Section_J.html).

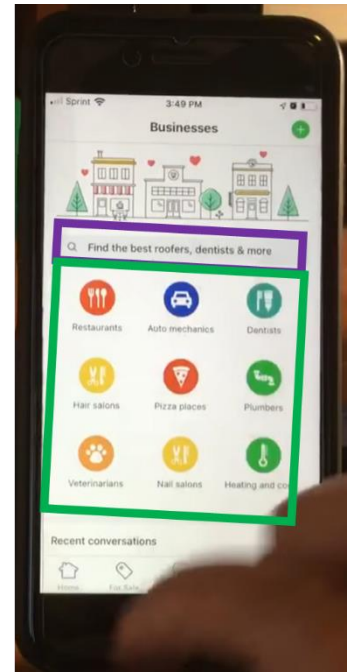
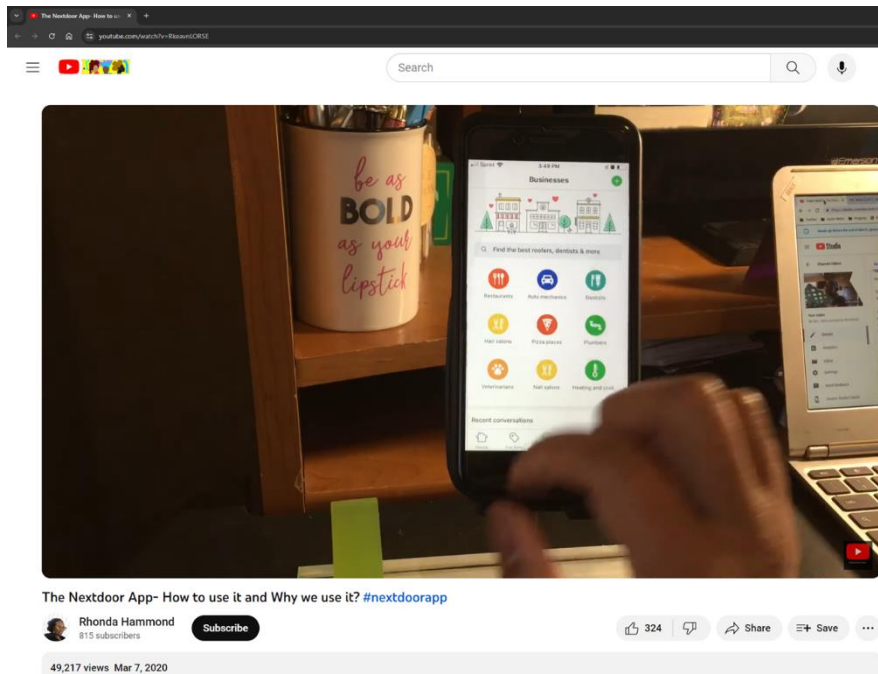
Related to this, Nextdoor is also launching out of beta its Groups feature to users worldwide. Similar to Facebook Groups, Nextdoor's Groups allows communities to **organize around topics, interests, providing aid or anything else.** But unlike Facebook, which doesn't have an official way to confirm people are who they say or where they live, **Nextdoor validates users by phone or postal mail.**

On Nextdoor Groups, neighbors can organize either by their specific neighborhood alone, with other neighborhoods nearby, or on a city-wide basis.

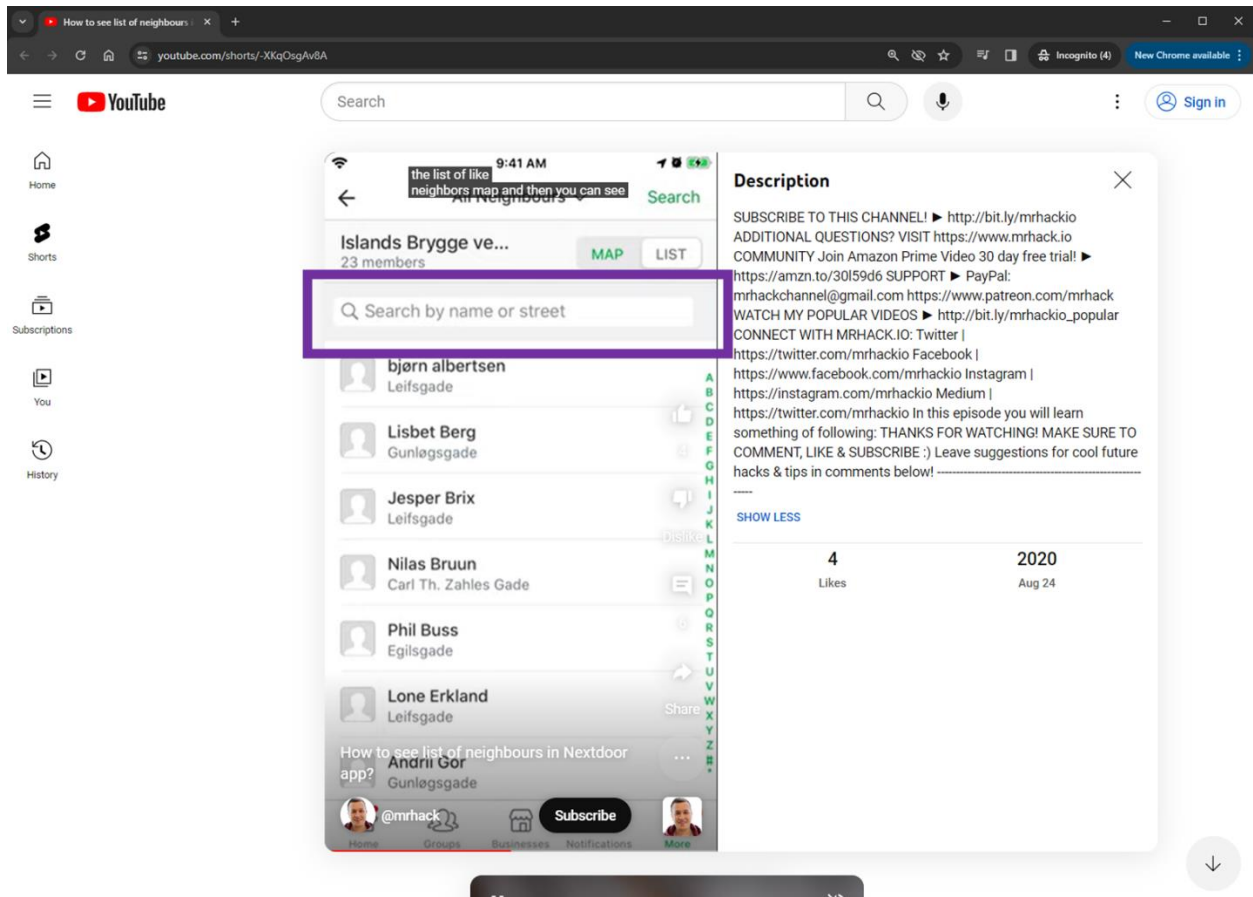
During the beta, neighbors were already beginning to use the feature for COVID-19 topics, including ways to unite communities, ways for parents to help kids stay connected during school closures and different hobbies that can be done while

Disrupt SF 2020
Announcing the Disrupt Digital Pass
San Francisco
Sep 14 - 16
[Register Today](#)

(E.g., <https://web.archive.org/web/20200321004339/https://techcrunch.com/2020/03/19/nextdoor-adds-help-maps-and-groups-to-connect-neighbors-during-the-coronavirus-outbreak/>
(Published March 19, 2020)).



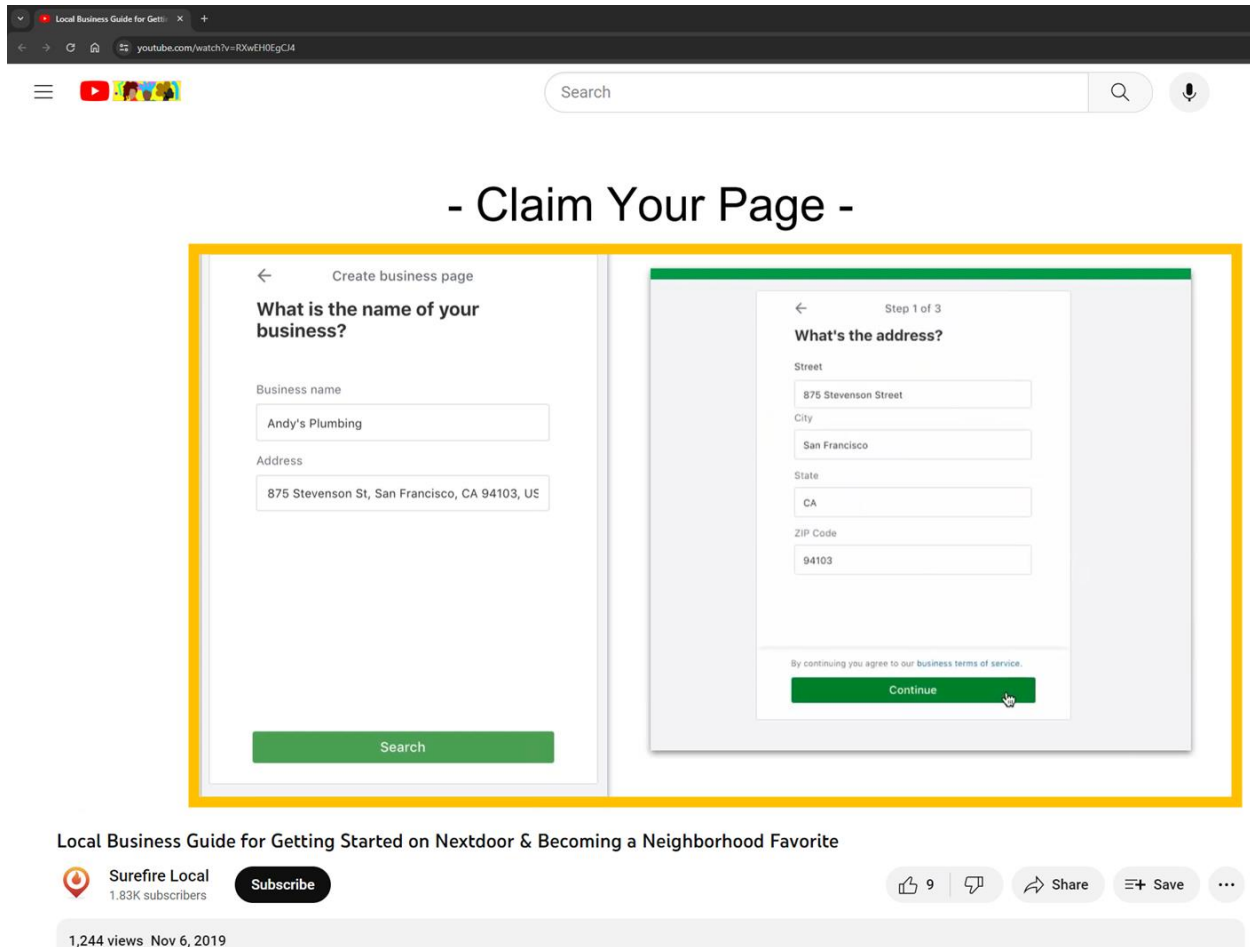
(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).



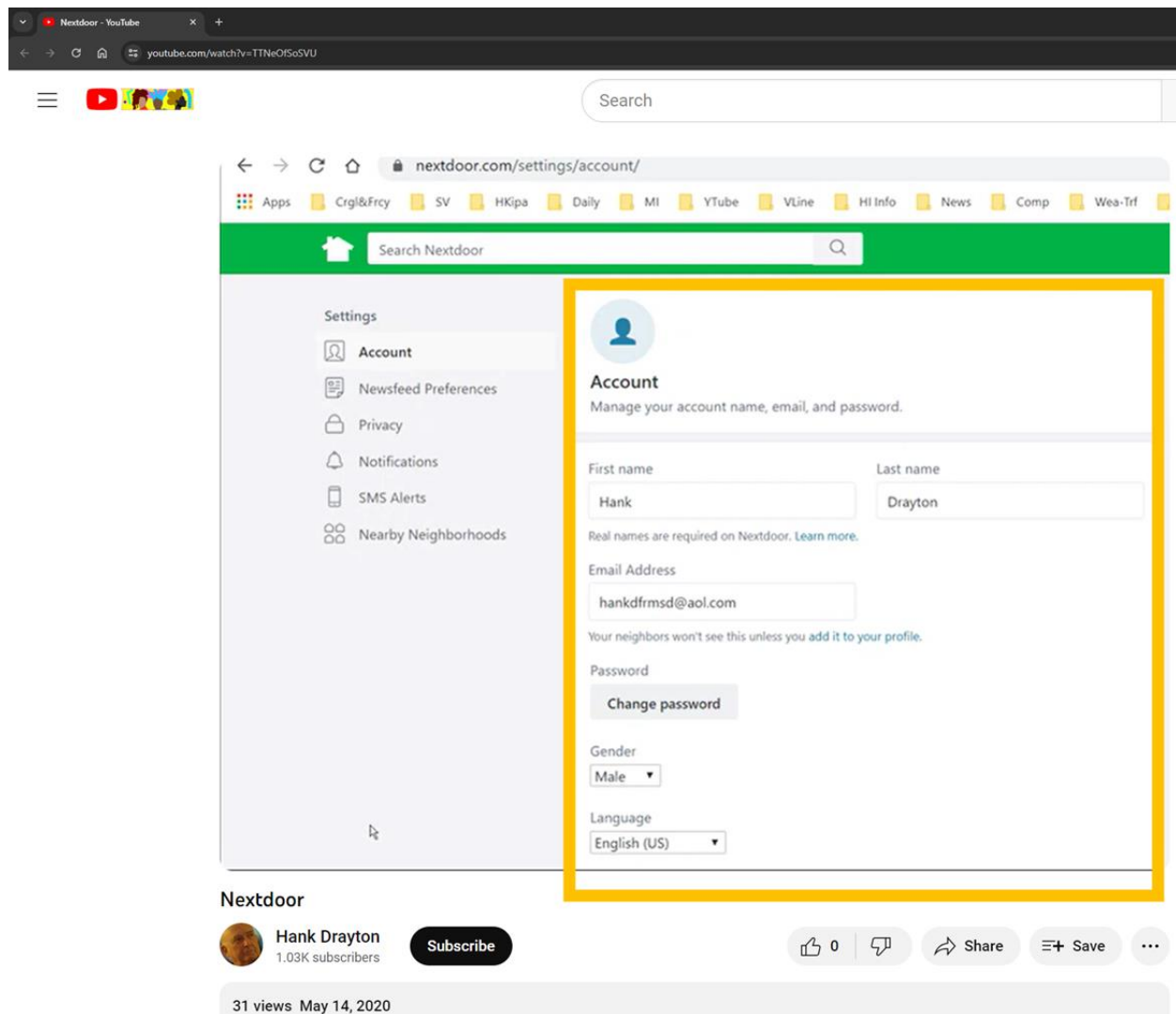
(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

47. The Accused Instrumentality includes an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions from a plurality of user-submitters, for example content pertaining to their respective user profiles on Accused Instrumentality, as well as multimedia content to be displayed on one or both of the user's profile, the live feed, and online neighborhood groups as discussed and shown in connection with the above discussion. The submissions pertaining to building a user profile, a business profile and to posting on neighborhood groups may include, *e.g.*, photo, hyperlinks and/or textual content. The submissions are provided to Accused Instrumentality via a submissions electronic interface, *e.g.*, a web-based content portal, accessible for example by logging in and selecting options to upload such content or import content, configured to receive such electronic media, from a plurality of

user-submitters over a public network (*e.g.*, the Internet) and stored, via an uploading process, in said electronic media submissions database for use in distribution to other users of Accused Instrumentality.



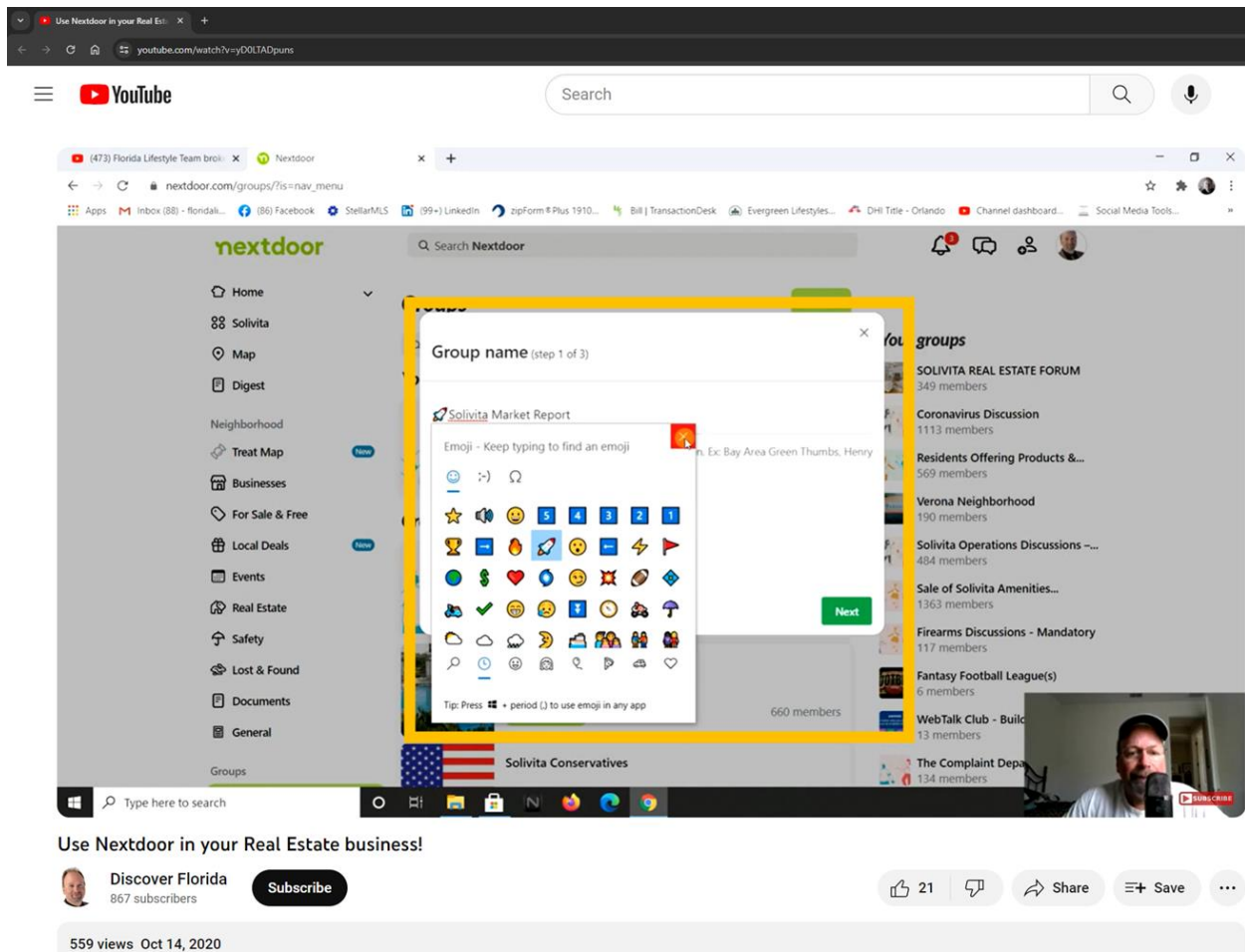
(*E.g.*, <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).



(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor app interface. At the top, there's a navigation bar with "Home", "Solivita", "Map", "Digest", "Neighborhood", "Treat Map", "Businesses", "For Sale & Free", "Local Deals", "Events", "Real Estate", "Safety", "Lost & Found", "Documents", and "General". The main feed shows a post by Christine Himick titled "Free bromeliads" with a photo of several potted plants. To the right, there's a "Treat Map" section with a "View map" button. The video description below the player states: "559 views Oct 14, 2020 Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

(E.g., <https://www.youtube.com/watch?v=yD0LTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Only Businesses that have received at least one recommendation will appear in the Recommendations section

Members can only see recommendations from their residential neighbors and nearby neighbors

Having more recommendations will help your business appear higher in search results

Search

Recommendations section

Business Page

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local
1.83K subscribers

Subscribe

9

Share

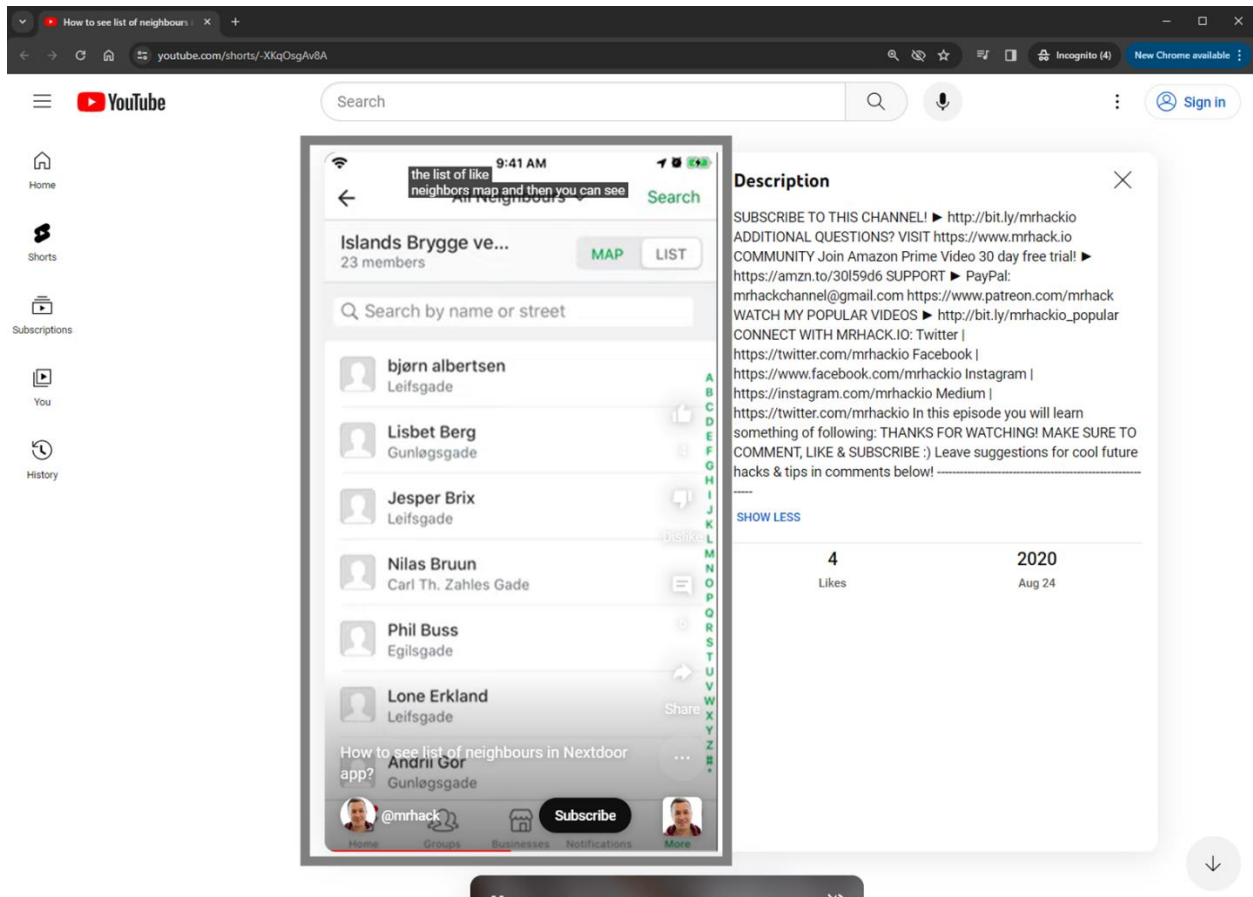
Save

1,244 views Nov 6, 2019

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

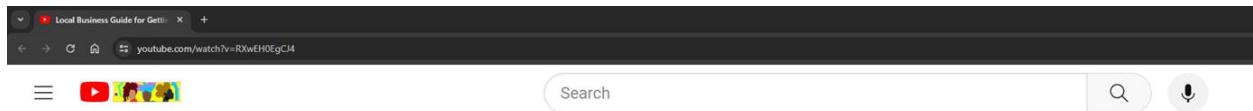
The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor website interface. A yellow box highlights the "Create" button in the "Groups" section. The video description reads: "559 views Oct 14, 2020 Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood."

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

48. The electronic media submissions database of Accused Instrumentality used by Nextdoor which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission. As shown below, data identifying the user-submitter includes *e.g.*, a name and/or a logo or profile picture displayed as a thumbnail. Data indicating content for each electronic media submission includes a photo and/or textual content.



- Complete Your Profile -

Hair Tactics
1835 SW Martinazzi Ave, Tualatin, O...

Local Deals
Your Reputation
Neighbor Comments
Inbox
Business Profile
Claim another page

Help · Guidelines · Privacy
About · Jobs · Press · Blog
© 2019 Nextdoor

Basic Information
Help neighbors get to know your business

Business name: Hair Tactics

Background image: [Map of Tualatin, OR]

Logo image: [Hair Tactics Logo]

Greeting message: Hair Tactics is just over 2 years old. Created by hairstylist and industry educator Brenda Lutu Clayton. Our salon has 4 full time stylist and 4 part time stylist. We offer color, haircutting, Waxing, eyelash extensions, Brazilian Blowouts and barbering. All our stylist go through mentorships with additional and ongoing advanced education. We offer a tiered pricing to fit your budget. We have a website www.hairtacticspdx.com as well as Instagram and Facebook. You can also see our extensive work on these pages. We are open Monday- Friday 9-7pm and Saturdays 9-6pm.

License #: Add your license #

Update basic info

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite



Surefire Local
1.83K subscribers

Subscribe

9



Share

Save



1,244 views Nov 6, 2019

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:

The screenshot shows a Nextdoor business page for 'Sunset Market'. The page layout includes a header with the business name and a 'Neighborhood Favorite' badge. Below the header is a large photo of a person holding a basket of produce. To the right of the photo is a map showing the location at 1234 9th Street, San Francisco, CA 94122. Below the map are the business hours (Mon-Fri: 8:00am - 6:00pm) and the phone number (415-552-0720). The page also features a 'Recommend' button and a section for 'Neighbors' who have recommended the business. Callouts on the left side of the page highlight the following features:

- Photo:** Choose a high res, 512x512 pixel photo
- Greeting message:** Add a greeting message that is both personable and approachable while including your professional qualifications.
- Recommendations:** Ask past and present clients to give you recommendations to build your reputation.

Callouts on the right side of the page highlight the following features:

- Address:** Include your company's address
- Office hours:** Enter in your hours of availability
- Contact information:** Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local 1.83K subscribers [Subscribe](#)

1,244 views Nov 6, 2019

9 [Share](#) [Save](#)

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Search

Post a message, event, poll or urgent alert

A Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · 🐕 Dogs

Thank Comment

130 32

See 21 previous comments

J Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply

2

Nextdoor

Hank Drayton
1.03K subscribers

Subscribe

0 Share Save

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot displays a YouTube video player. The video title is "Use Nextdoor in your Real Estate business!". The channel is "Discover Florida" with 867 subscribers. The video has 559 views and was published on October 14, 2020. The video content shows a Nextdoor app interface. At the top, there's a search bar and a navigation menu. The main content area shows a real estate listing for a house at 304 Trevino Drive. The listing includes a photo of the house, a description of an open house event, and a list of features like a screened portico and wood flooring. The video also shows a "Subscribe" button and a "Share" button.

Use Nextdoor in your Real Estate business!

Discover Florida
867 subscribers

Subscribe

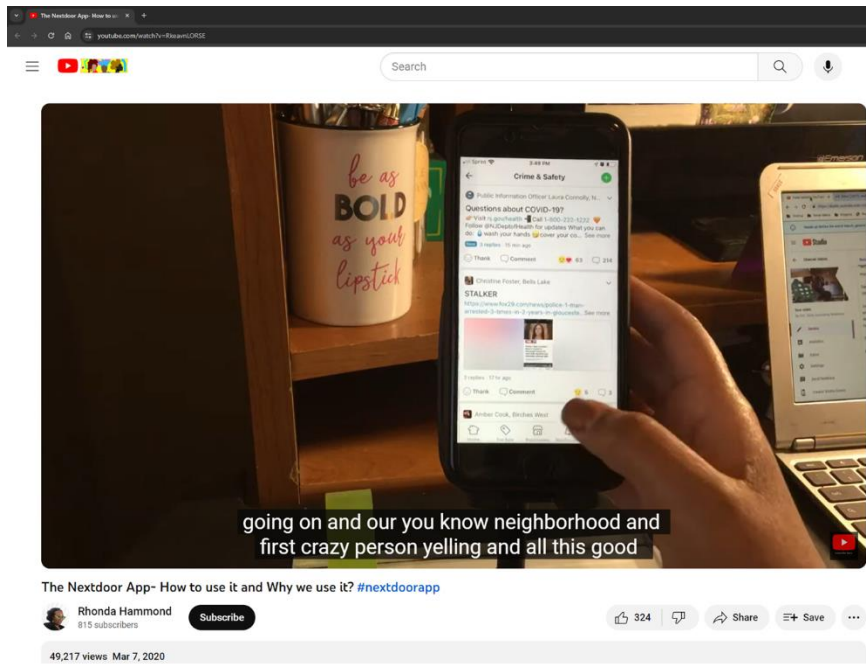
21 | | Share | Save | ...

559 views Oct 14, 2020

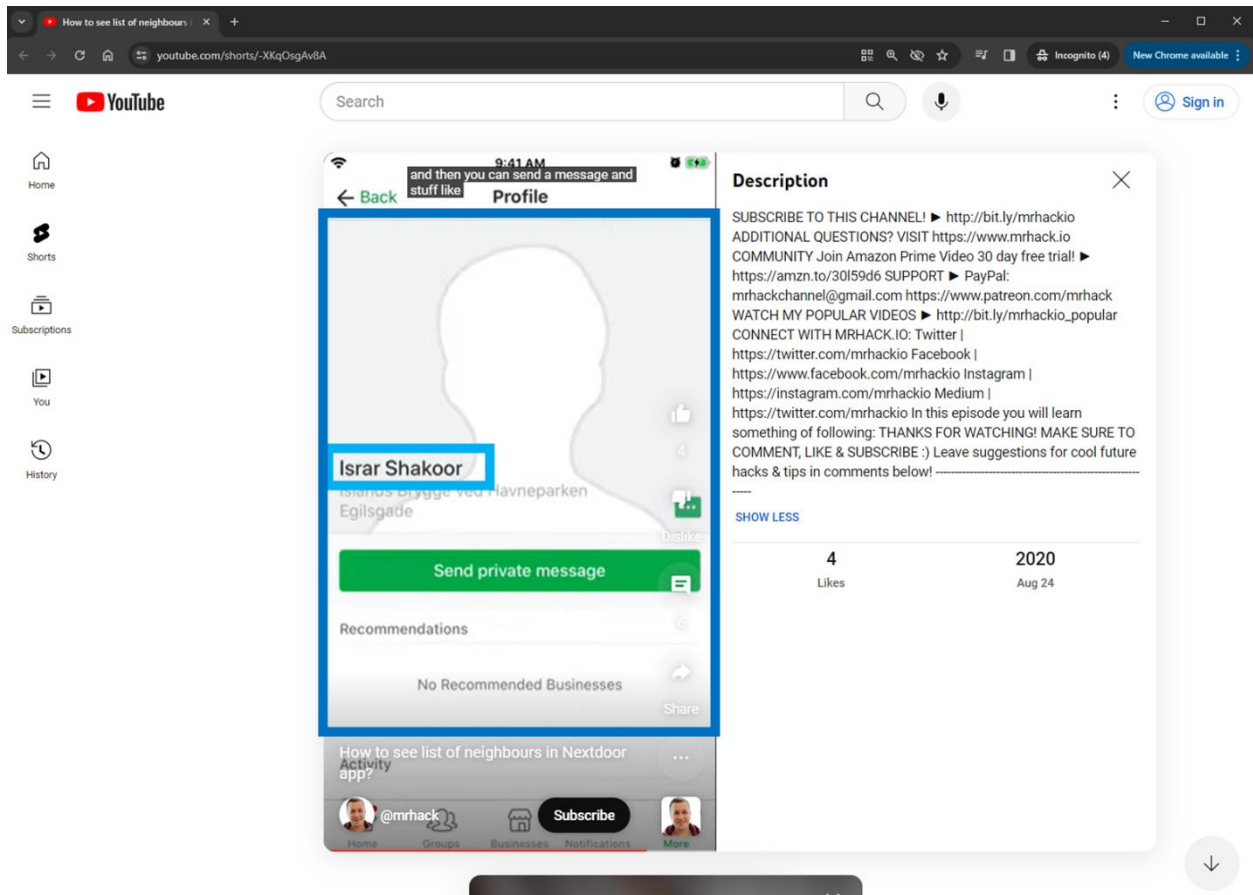
Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business!

Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



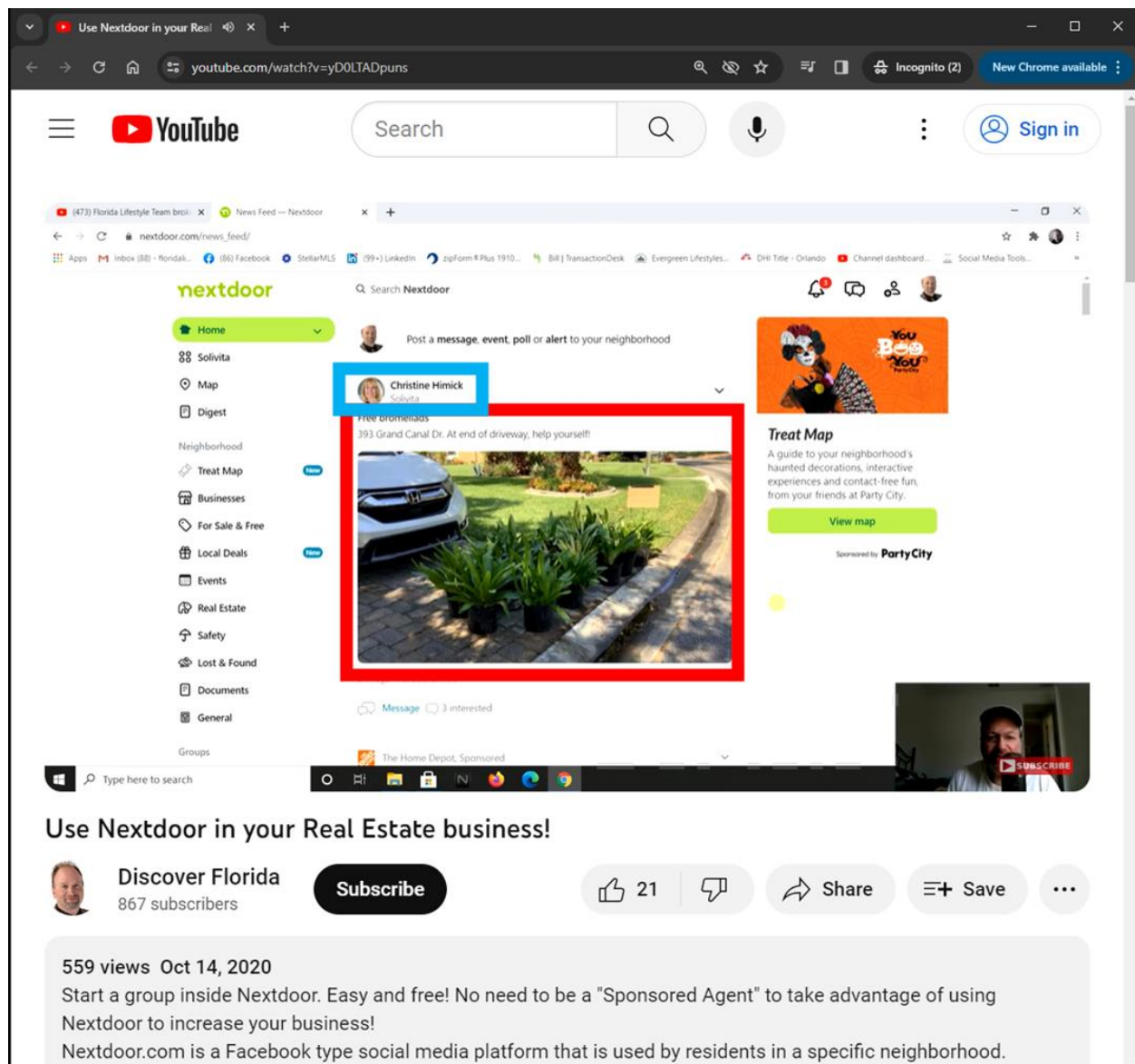
(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).



(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

49. The Accused Instrumentality electronically generates a multimedia file from the retrieved electronic media submissions, in accordance with a selected digital format (e.g., a digital format compatible with a selected digital format compatible with the particular device such as a computer or smart phone incorporating one or more browsers or apps), and the identification of the submitter is maintained with each retrieved submission within the multimedia file. As shown below, data identifying the user-submitter includes e.g., a name and profile picture identifying the user and textual content, along with embedded hyperlinks to listings (such as real estate listings) and recommendations. For example, below are examples of such multimedia files being displayed within a user's browser or app, on a user device, in association with the identification of the submitter is maintained with each retrieved submission within the multimedia file having

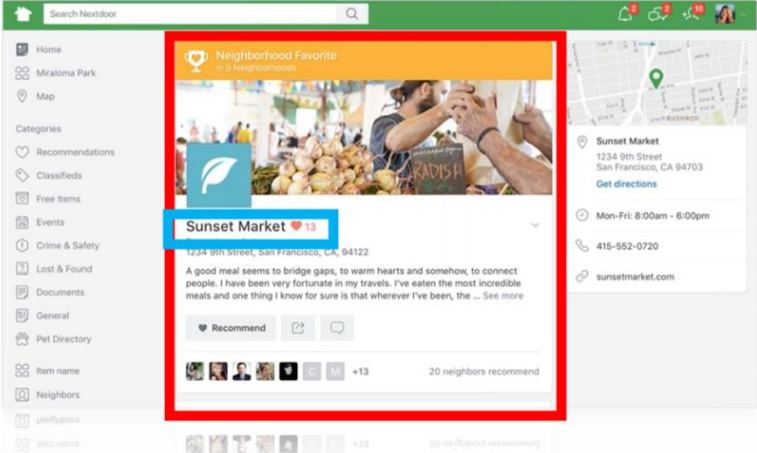
associated multimedia content (e.g., the profiles and/or various content as discussed above), for example as shown below.



(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:



The screenshot shows a Nextdoor business page for 'Sunset Market'. A red box highlights the main content area, which includes a 'Neighborhood Favorite' badge, a photo of a person at a market stall, the business name 'Sunset Market' with 13 likes, the address '1234 9th Street, San Francisco, CA, 94122', a short paragraph about the business, and a 'Recommend' button. To the left of the main content is a sidebar with categories like Home, Miraloma Park, Map, Recommendations, Classifieds, Free Items, Events, Crime & Safety, Lost & Found, Documents, General, Pet Directory, Item name, Neighbors, and a 'Join group' button. To the right is a map showing the location of 'Sunset Market' at 1234 9th Street, San Francisco, CA 94122, along with contact information: 'Mon-Fri: 8:00am - 6:00pm', '415-552-0720', and 'sunsetmarket.com'. Annotations on the left side of the screenshot provide tips for each section: 'Photo: Choose a high res, 512x512 pixel photo'; 'Greeting message: Add a greeting message that is both personable and approachable while including your professional qualifications.'; 'Recommendations: Ask past and present clients to give you recommendations to build your reputation.'; 'Address: Include your company's address'; 'Office hours: Enter in your hours of availability'; and 'Contact information: Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication'.

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local 1.83K subscribers [Subscribe](#)

1,244 views Nov 6, 2019

9 [Share](#) [Save](#) [More](#)

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Post a message, event, poll or urgent alert

A Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · 📍 Dogs

😊 Thank 💬 Comment ▾ 🥰❤️👍 130 💬 32

See 21 previous comments

J Jables Benavides, San Carlos-Mission Gorge ▾

Good reminder. Thank you.

1 day ago Thank Reply 🥰❤️ 2

Nextdoor

Hank Drayton
1.03K subscribers

Subscribe

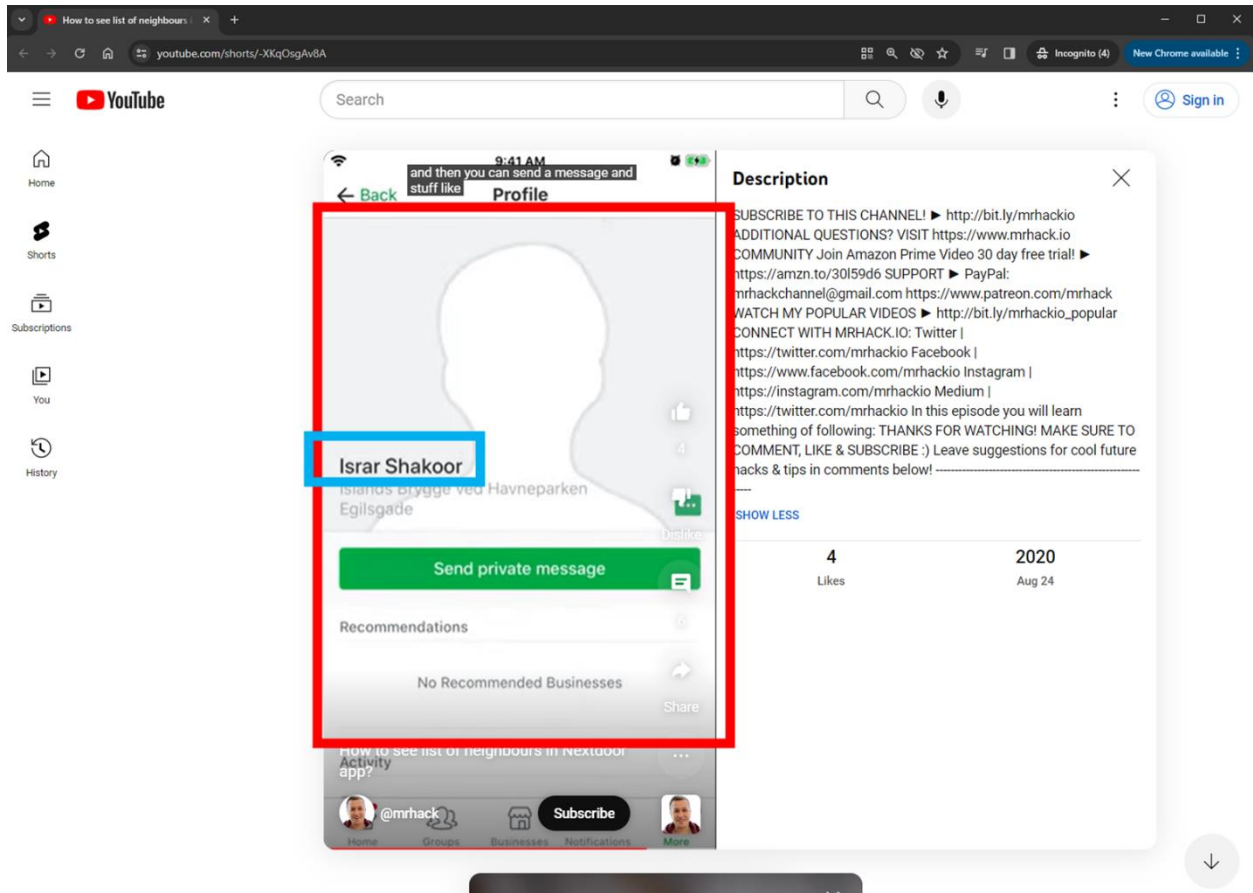
👍 0 💬 Share ➕ Save ⋮

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).

The screenshot shows a YouTube video player with the title "Use Nextdoor in your Real Estate business!". The video content displays the Nextdoor mobile app interface. A red rectangular box highlights a real estate listing for a house at 304 Trevino Drive. The listing includes a photo of the house, the text "OPEN HOUSE! - 304 Trevino Drive - 1-3 PM TOMORROW October 11th, come see this golf course home! Offered at \$372,000. STOP and SEE this home on 10th fairway of Stonegate's Oaks course! TRANSITIONAL CALABRIA with structural and comfort upgrades: SCREENED PORTICO with leaded glass entry; WOOD FLOORING", and a "See more..." link. Above the listing, the user "Steve LoTempio" is shown with a profile picture and the text "Solivita • 5 days ago". The video player shows 559 views, a date of Oct 14, 2020, and a description: "Start a group inside Nextdoor. Easy and free! No need to be a 'Sponsored Agent' to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood." The video has 21 likes and a "Share" button.

(E.g., <https://www.youtube.com/watch?v=yDOLTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/shorts/-XXqOsgAv8A> (Published August 24, 2020)).

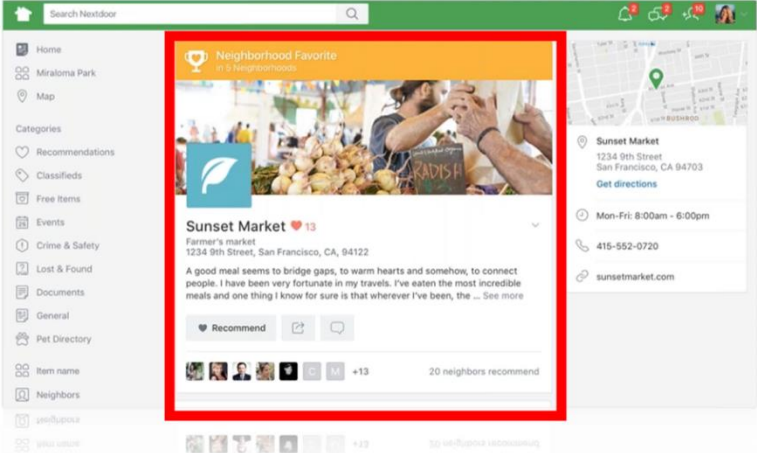
50. The Accused Instrumentality, in order to distribute its multimedia content to a geographically distributed userbase, electronically transmits the multimedia file to a plurality of publicly accessible web servers, so as to be made electronically available multimedia profile and/or post content with associated photo, profile picture, and textual content to users, thereby making the multimedia content electronically available for viewing on one or more user devices over a public network (e.g., the Internet). For example, as shown below, multimedia content associated with user profiles and posts is provided on various user devices (e.g., a computer or other device with a web browser or app) in response to a user logging in to Accused Instrumentality. Nextdoor uses function-specific subsystems, for example as discussed below.

The screenshot shows a YouTube video player with the URL [youtube.com/watch?v=yD0LTADpuns](https://www.youtube.com/watch?v=yD0LTADpuns). The video content displays the Nextdoor app interface. On the left is a navigation menu with options like Home, Solivita, Map, Digest, Neighborhood, Treat Map, Businesses, For Sale & Free, Local Deals, Events, Real Estate, Safety, Lost & Found, Documents, and General. The main feed shows a post by Christine Himick, Solivita, titled 'Free bromeliads' with a photo of several potted plants. This post is highlighted with a red rectangular box. To the right of the post is a 'Treat Map' sponsored by Party City. Below the video, the title 'Use Nextdoor in your Real Estate business!' is displayed, followed by the channel 'Discover Florida' with 867 subscribers and a 'Subscribe' button. Engagement metrics show 559 views and a date of Oct 14, 2020. The description text reads: 'Start a group inside Nextdoor. Easy and free! No need to be a "Sponsored Agent" to take advantage of using Nextdoor to increase your business! Nextdoor.com is a Facebook type social media platform that is used by residents in a specific neighborhood.'

(E.g., <https://www.youtube.com/watch?v=yD0LTADpuns> (Published October 14, 2020)).

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Build an effective business page with these handy tips:



The screenshot shows a Nextdoor business profile for 'Sunset Market'. A red box highlights the main profile area, which includes a profile picture, a 'Neighborhood Favorite' badge, a cover photo, the business name 'Sunset Market' with 13 hearts, address 'Farmer's market, 1234 9th Street, San Francisco, CA, 94122', a bio, and a 'Recommend' button. To the left of the profile, a sidebar lists categories like Home, Miraloma Park, Map, Recommendations, Classifieds, Free items, Events, Crime & Safety, Lost & Found, Documents, General, Pet Directory, Item name, Neighbors, and a 'post business' button. To the right, a map shows the location, and a sidebar lists details like address, office hours, and contact information.

Photo
Choose a high res, 512x512 pixel photo

Greeting message
Add a greeting message that is both personable and approachable while including your professional qualifications.

Recommendations
Ask past and present clients to give you recommendations to build your reputation.

Address
Include your company's address

Office hours
Enter in your hours of availability

Contact information
Provide your phone number and website. Be sure to fill out each field as every customer has their own preferred method of communication

Local Business Guide for Getting Started on Nextdoor & Becoming a Neighborhood Favorite

Surefire Local
1.83K subscribers **Subscribe**

1,244 views Nov 6, 2019

9 | | Share | Save | ...

(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

Nextdoor - YouTube

youtube.com/watch?v=TTNeOISoSVU

Post a message, event, poll or urgent alert

Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk

See more...

5 May · 📍 Dogs

Thank Comment

😊❤️👍 130 32

See 21 previous comments

Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply 😊❤️ 2

Nextdoor

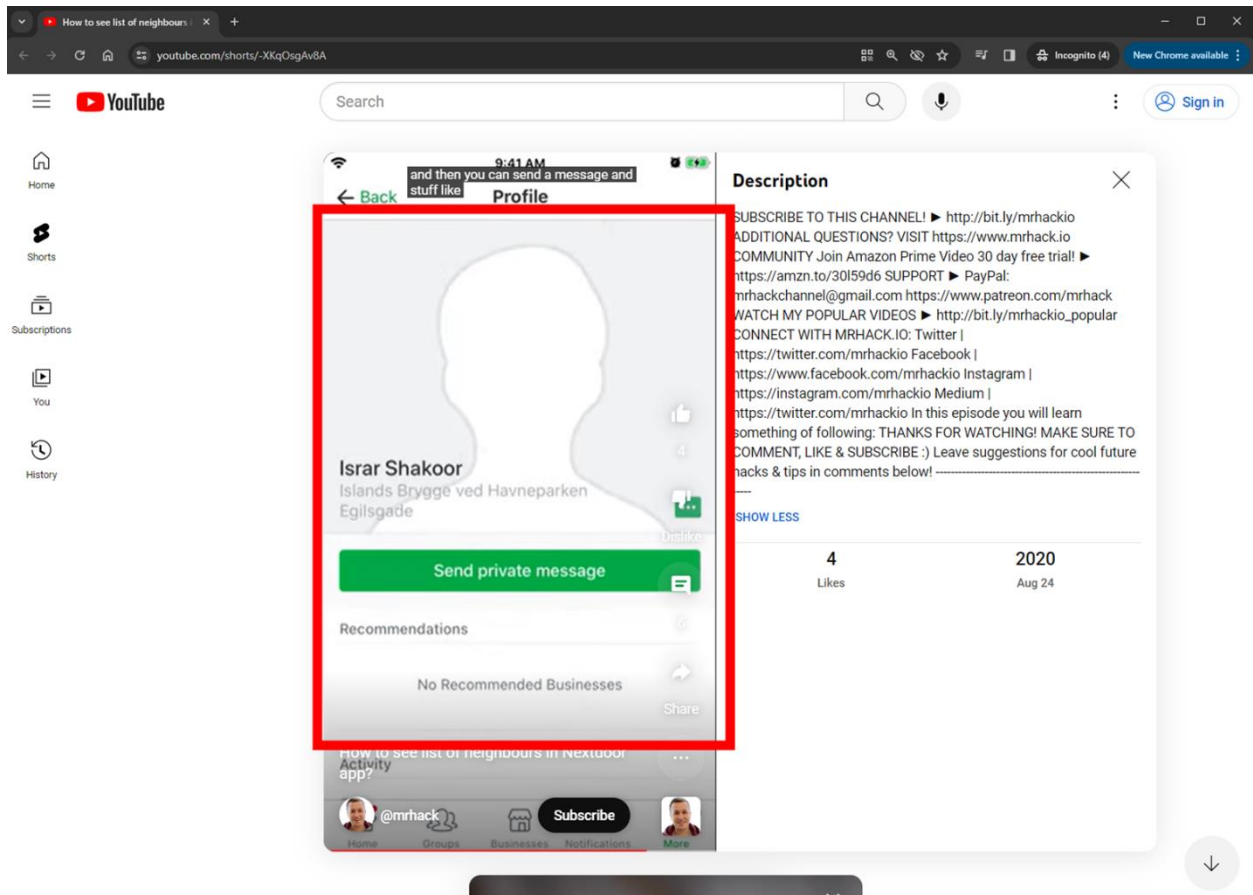
Hank Drayton
1.03K subscribers

Subscribe

👍 0 🗨️ Share ➡️ Save ...

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=yD0LTADpuns> (Published October 14, 2020)).



(E.g., <https://www.youtube.com/shorts/-XKqOsgAv8A> (Published August 24, 2020)).

51. The Accused Instrumentality employs a web-based graphical user interface enabling its users to electronically access an electronic voting subsystem, enabling tracking of voting or electronic rating, configured to enable a user to electronically vote for or rate (e.g., by the users choices with respect to a selection of a “Thank” and or a smiley face icon, a heart icon or a like icon) an electronically available multimedia content (e.g., a multimedia profile provided by a user-submitter, with accompanying photo and/or textual content). Users may also elect to post a Recommendation for business profiles. Nextdoor uses function-specific subsystems, for example as discussed below.

Nextdoor - YouTube

youtube.com/watch?v=TTNeOfSoSVU

Post a message, event, poll or urgent alert

A Angela Salerno, Allied Gardens South

BLACKTOP TOO HOT FOR DOG PAWS

Hi Neighbors, I have noticed several people walking their dogs through parking lots or talking in the street with their dogs next to them on leash, while it is warm outside and the blacktop is piping hot. The blacktop is extremely hot when the weather is warm and it burns dog pads, as it would the bottom of our feet. Please do not walk See more...

5 May · Dogs

Thank Comment

130 32

See 21 previous comments

J Jables Benavides, San Carlos-Mission Gorge

Good reminder. Thank you.

1 day ago Thank Reply

2

Nextdoor

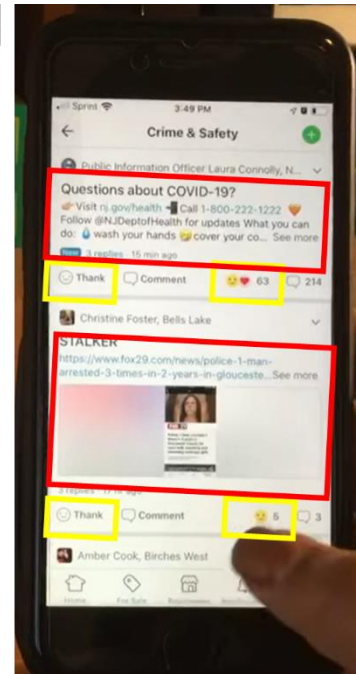
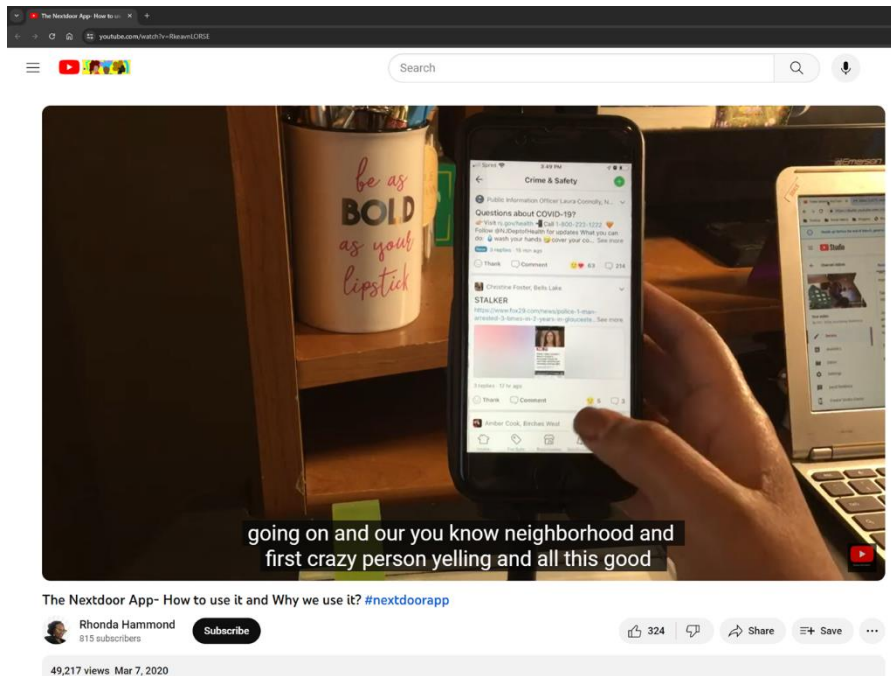
Hank Drayton
1.03K subscribers

Subscribe

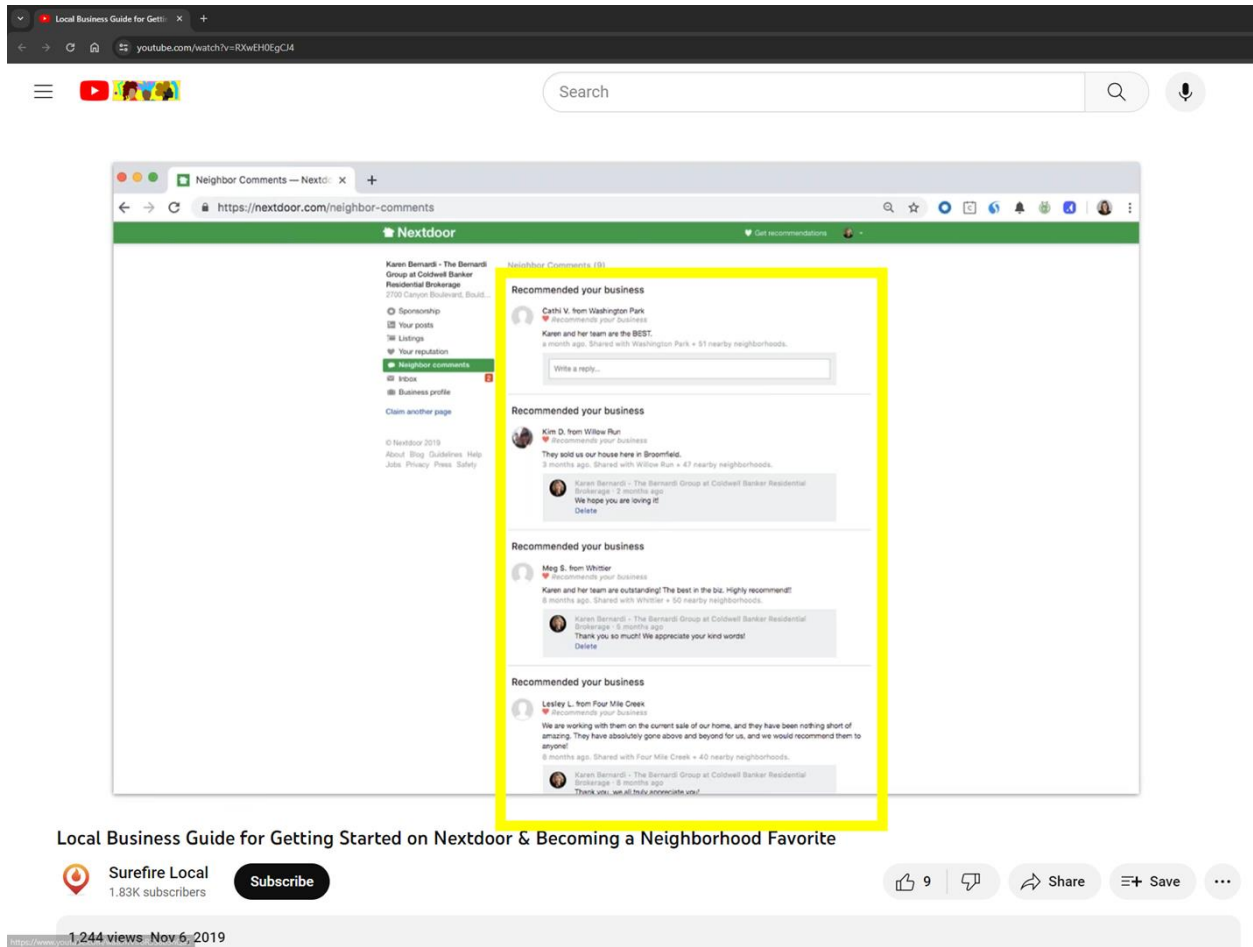
0 Share Save

31 views May 14, 2020

(E.g., <https://www.youtube.com/watch?v=TTNeOfSoSVU> (Published May 14, 2020)).



(E.g., <https://www.youtube.com/watch?v=RkeavnLORSE> (Published March 7, 2020)).



(E.g., <https://www.youtube.com/watch?v=RXwEH0EgCJ4> (Published November 6, 2019)).

52. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '665 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

53. To the extent marking is required, VCA has complied with all marking requirements.

V. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 9,501,480 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 9,477,665 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- d. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- e. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

November 20, 2023

OF COUNSEL:

David R. Bennett
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
(312) 291-1667
dbennett@directionip.com

CHONG LAW FIRM, P.A.

/s/ Jimmy Chong
Jimmy Chong (#4839)
Chong Law Firm, P.A.
2961 Centerville Road, Suite 350
Wilmington, DE 19808
Telephone: (302) 999-9480
Facsimile: (302) 800-1999
Email: chong@chonglawfirm.com

*Attorneys for Plaintiff
Virtual Creative Artists, LLC*